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Agriculture**

**Forest Service**

**Northern Region**

**Idaho Panhandle  
National Forests**

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# **Coeur d'Alene River Ranger District Hither and Yon Beetle Project**

## **Decision Notice**



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**ATTACHMENT A** - Corporate Monitoring Information

**ATTACHMENT B** – Species Viability

**ATTACHMENT C** – Response to Public Comments

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# **HITHER AND YON BEETLE PROJECT**

## **Decision Notice**

### **Coeur d'Alene River Ranger District**

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## **1. Purpose And Need For Action**

Over the past several years, a widespread Douglas-fir beetle infestation has caused significant mortality to Douglas-fir trees scattered throughout the Coeur d'Alene River Ranger District. The Douglas-fir beetle outbreak that began on the district in 1998 is on the decline. However, we are still discovering small pockets of recent bark beetle mortality scattered across the district. We have recently discovered areas located in the vicinity of Spyglass Peak, Grassy Mountain, Grizzly Mountain, and Dobson Pass (EA, p. 1-1).

The Spyglass Peak area and other areas of beetle mortality identified in the West Fork of Steamboat, Flat Creek, and Miners Creek have been dropped from further consideration due to old growth and wildlife habitat concerns (please refer to the EA, Chapter 2, Section 2.3.4 and Appendix A, "Alternatives Considered But Eliminated From Further Consideration").

Timber mortality in the Grassy Mountain, Grizzly Mountain and Dobson Pass areas is primarily a result of Douglas-fir beetle attacks that occurred during the 1999 through 2001 seasons. The proposed activities are outside of the project areas considered under the previously completed Douglas-fir Beetle Environmental Impact Statement (USDA Forest Service, 1999) and Small Sales Environmental Impact Statement (USDA Forest Service, 2000). Beetle mortality occurred in the new project areas as a result of subsequent flights and was not visually apparent until the 2000 and 2001 field seasons.

The Hither and Yon Environmental Assessment (EA) was prepared to document the effects of salvaging some of this beetle-kill for timber products, initiating fuels reduction treatment, and restoring ecosystems in areas of low residual stand stocking levels.

The purpose of this proposal is to:

- *allow recovery of the economic value of dead and diseased timber*
- *promote long-term vegetative restoration in areas of low residual stand stocking as a result of timber mortality to root disease and bark beetles.*

## **2. Proposed Action**

The proposed action (represented by Alternative 2) is to:

- 1) *Harvest dead and dying trees in areas attacked by bark beetles, damaged by snow or ice, or opened by losses to root disease, using salvage and regeneration harvest methods;*
- 2) *reduce the long-term fire hazard through timber harvest and a combination of fuels treatment methods;*
- 3) *enhance historical ecosystems through western larch thinning, improvement harvests in ponderosa pine stands, and ecoburning activities; and*
- 4) *restore long-lived seral tree species such as white pine, western larch and ponderosa pine in areas where a substantial portion of the live basal area of the stand has been lost to bark beetle, snow or ice damage, and root disease through timber harvest, site preparation, and planting of seedlings.*

Under the Proposed Action, timber harvest and associated fuels treatments would occur on a total of approximately 52 acres in the Grassy Mountain area, 55 acres in the Grizzly Mountain area, and 77 acres in the Dobson Pass area (a total of 184 acres). For more specific information regarding activities that would occur under the Proposed Action (such as

acres of harvest by prescription, yarding methods, fuels treatments, etc.), please refer to the EA (Table 2-4, the alternative descriptions in Chapter 2, and the alternative maps for the three areas [Figures 2-1, 2-2 and 2-3]).

### **3. Alternatives To The Proposed Action**

As stated above, Alternative 2 represents the Proposed Action. Three alternatives to the proposed action were analyzed in detail. No new road construction would occur under any of the alternatives considered.

**Alternative 1** is the No-Action Alternative required by NEPA and NFMA (EA, p. 2-11). Under this alternative, none of the proposed activities would occur at this time. There would be no change from current management direction or from the level of management intensity in the area. Implementation of foreseeable activities (identified on pages 2-7 through 2-9 of the EA) would still occur.

The vegetative objective of **Alternative 3** (described in the EA on pages 2-12, 2-14 through 2-19) would be to salvage dead and dying trees in areas with beetle mortality, similar to Alternative 2 as described above, and proposed the same harvest treatments as described in Alternative 2 (the Proposed Action). However, in addition, approximately 72 acres of selected ecoburning would also be implemented in the Grizzly Mountain area as ecosystem treatments and to provide logical burn boundaries for slash disposal treatments within harvest units. Understory removal harvest treatments would occur within the ecoburn areas prior to implementation of the burns. The understory removal harvest would remove smaller merchantable trees not expected to survive the ecoburn. Generally this would involve trees less than 12 inches in diameter, depending on the species. Fading trees from root disease, beetles, and other causal agents would also be salvaged in this operation. Older dead beetle mortality would be retained on site for wildlife habitat. Timber would be removed from these ecoburns using helicopter yarding systems.

The vegetative objective of **Alternative 4** (described in the EA on pages 2-12, 2-14 through 2-19) would also be similar to Alternative 2 (to salvage dead and dying trees in areas with beetle mortality). In addition, approximately 34 acres of selected ecoburning would be implemented in the Grizzly Mountain area, similar to Alternative 3, except that no understory removal harvest treatments would occur within the ecoburn areas under this alternative.

### **4. Criteria For My Decision**

This Decision Notice documents the decisions I have made for this project, based on:

- *the extent to which each alternative addresses the purpose and need for action*
- *how well each alternative responds to environmental issues and concerns identified by the public, other agencies, and Forest Service resource specialists*
- *consistency with the goals and findings of Forest policy and legal mandates*
- *effects of the selected alternative in comparison to other alternatives considered*

### **5. The Selected Alternative**

#### **5.1 Description of the Selected Alternative**

I have decided to implement **Alternative 3** with one modification. Alternative 3 is described on pages 2-12, and 2-14 through 2-19 of the Environmental Assessment. Under the Selected Alternative, specific timber harvest, fuels treatment, road reconstruction and associated activities will be implemented in the **Grassy Mountain, Grizzly Mountain, and Dobson Pass** project areas. Under the Selected Alternative, Unit 9 (the “fish wood” unit) has been modified. Field reconnaissance during the summer of 2002 found that a portion of the 9-acre unit was too steep to tractor yard, and that overstory-stocking levels were higher than originally estimated. As a result, a total of only 6 acres will be treated (5 acres will be tractor yarded and 1 acre will be highbank cabled to the road). Since only 2 acres would be left for grapple piling in the Grassy Mountain area, economics dictate that those 2 acres now be jackpot burned. Slash will be lopped and scattered on the site and the openings in the area will be allowed to regenerate naturally.

A summary of the estimated amount of harvest by silvicultural prescription, fuels treatment, and yarding methods that will occur under the Selected Alternative as a whole is provided in Table 1, followed by a description of the activities that will occur in each specific project area, with maps of each of the project areas.

No new road construction will occur in any of the three project areas. Approximately one-tenth of a mile of roadway will be reconstructed. The timber harvest activities will result in a commercial volume of 2,000 cunits (equal to approximately 1 million board feet).

### **5.1.1. Overview of Activities to be Implemented**

From a vegetation standpoint, the objective of the Selected Alternative (Alternative 3) is to harvest dead and dying trees in areas attacked by Douglas-fir bark beetles, to salvage trees fading to root disease and other causal agents of mortality, to enhance historical ecosystem components, and to restore long-lived seral tree species such as white pine, western larch and ponderosa pine in stands where bark beetles, root disease, and other causal agents have killed a substantial portion of the basal area of the stand. The emphasis of the treatment will be to salvage dead and dying timber.

In stands where mortality is generally light (over 50% of live basal area remaining in the stand), individual tree selection harvest treatment would salvage trees killed by bark beetles (this includes trees that are attacked by beetles that have crown symptoms indicating the trees will die) and associated trees fading to root disease or other pathogens. Additional incidental green trees may need to be removed to allow for safe felling practices or removal of trees significantly damaged during the harvest operation.

**Table 1. Summary of activities under the Selected Alternative (Modified Alternative 3).**

Feature	Selected Alt.
<b>Total harvest (acres)</b>	<b>253</b>
Salvage	62
Group Shelterwood (with planting)	59
Commercial thin	33
Improvement harvest	17
Understory removal	72
Fish wood harvest	6
Special harvest	4
<b>Total fuels treatment (acres)</b>	<b>253</b>
Lop and scatter	103
Jackpot	68
Underburning	10
Ecoburning	72
<b>Total yarding systems (acres)</b>	<b>253</b>
Cable	32
Skyline	64
Tractor	13
Helicopter	144
Miles of road reconstruction	0.1

Fuels would be treated by lop and scattering with a minor amount of jackpot burning. Lop and scatter treatment would get this material on the ground where it will decompose quicker.

In stands where beetle, root disease and blister rust-related mortality is more severe (generally over 50% loss of overstory basal area), a regeneration harvest (group shelterwood) would be used to create conditions suitable for the planting and establishment of pines and larch regeneration. Most of these areas would have slash reduced using prescribed fire treatments (either jackpot or underburning). Treated areas would then be planted to white pine, larch and ponderosa pine. The emphasis would be on retention of groups of large healthy overstory trees to maintain visual quality objectives on the sites. Smaller green trees that are not expected to survive prescribed fire treatments in these stands would be harvested unless retained for wildlife habitat. Generally, healthy Douglas-fir over 16 inches in diameter and grand fir over 18 inches in diameter would be retained on site. Regeneration harvest units would retain groups of trees and/or scattered individual trees that have been unaffected by the bark beetle infestation, root disease, or other pathogens. Generally, 20-30% of the stand basal area would be retained in shelterwood harvest prescriptions. Timber products will be removed using tractor, cable, skyline, and helicopter yarding methods. No new road construction is needed.

### **5.1.2. Activities to be Implemented in the Grassy Mountain Project Area**

Information about specific treatment units in the Grassy Mountain Project Area is displayed in Table 2, below. Salvage treatment in Grassy Mountain Unit 9 (shown in Figure 3) will provide wood for ongoing fish habitat improvement projects previously approved in the Yellowdog Creek watershed (not associated with the Hither and Yon proposal). This area contains considerable down material that is no longer usable for sawtimber products.

There is a section of Road 260 in the Grassy Mountain project area (approximately 2.5 miles from Riley Saddle north to the junction with Road 1564 where approximately 50-75 trees are encroaching along the running surface of the roadway. These trees are making it difficult to do routine road maintenance and snowmobile trail grooming during the winter months. Under the Selected Alternative, these “bumper trees” will be harvested to improve road maintenance and winter grooming. Stumps of the trees on the roadway will be ground down so that they do not interfere with surface blading operations. Based on the width of the road, this harvest treatment will cover a total of approximately 4 acres (identified as Unit 10). Since these trees are widely distributed, logging slash will generally be scattered off the roadway.



**Figure 1. Grassy Mountain Unit 9.**

A preferred public firewood gathering opportunity will be considered in the Grassy Mountain Project Area after harvest operations are completed.

**Table 2. Specific Unit Information with the Grassy Mountain Project Area, Selected Alternative 3.**

Unit <sup>1</sup>	Acres	Treatment	Volume (mbf <sup>2</sup> )	Yarding	Fuels Treatment	Planting
1	4	Sanitation/Salvage	20	Cable	Jackpot burn lower half	Natural
2	4	Sanitation/Salvage	20	Skyline	Lop & Scatter	None
3	9	Sanitation/Salvage	30	Cable	Lop & Scatter	None
4	2	Sanitation/Salvage	5	Cable	Lop & Scatter	None
5	9	Roadside Salvage	25	Cable	Lop & Scatter	None
6	8	Sanitation/Salvage	25	Tractor	Lop & Scatter	None
7	3	Roadside Salvage	5	Cable	Lop & Scatter	None
9	6	Fish Wood	10 truck loads	Tractor/ Cable	Lop & Scatter	None
10	4	Special Harvest	10	Cable	Remove slash from roadway	None
<b>Total</b>	<b>49</b>		<b>140</b>			

<sup>1</sup> Grassy Mountain Unit 8 was dropped under all alternatives due to concerns for wildlife habitat.

<sup>2</sup> mbf = thousand board feet



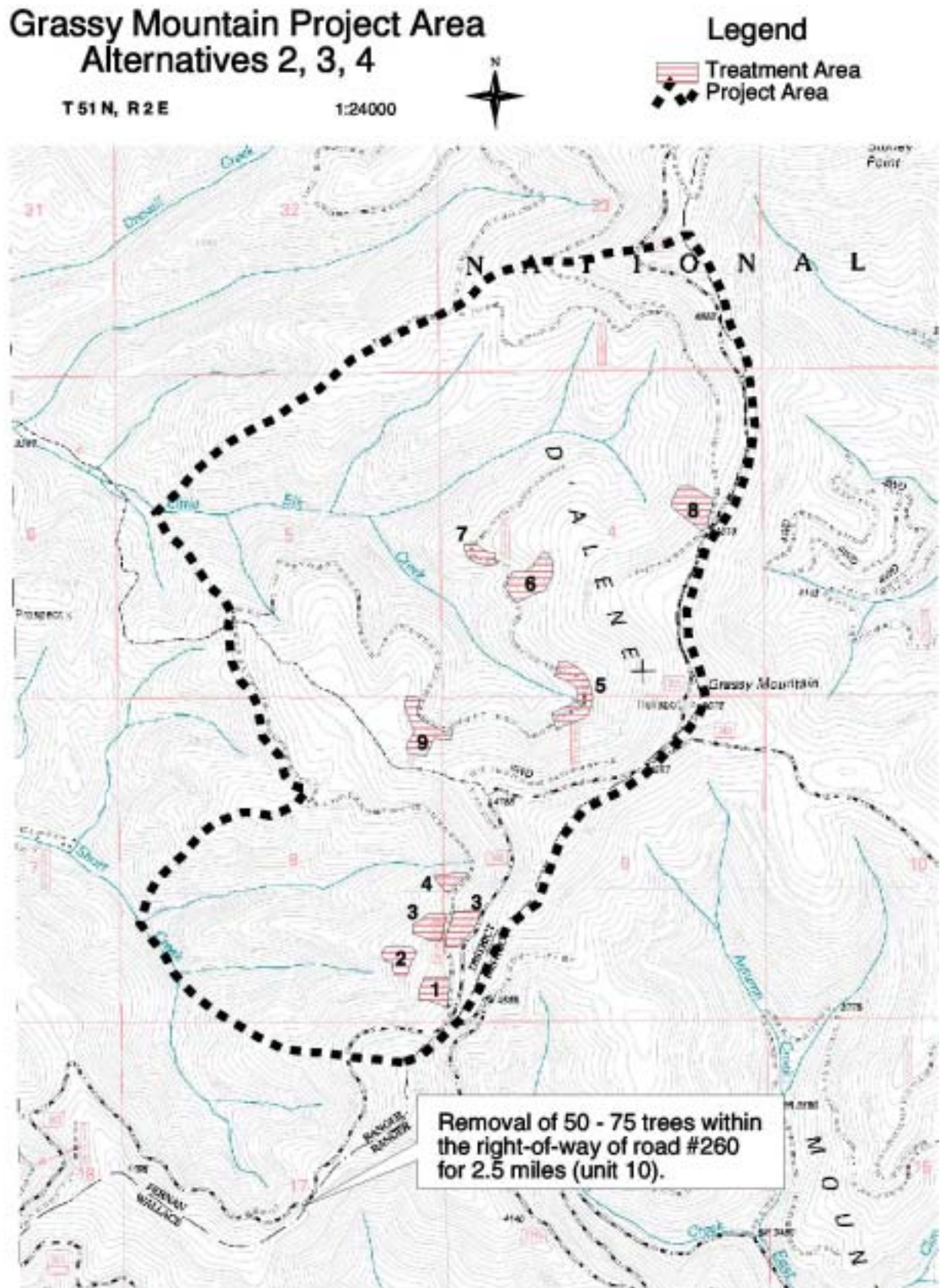


Figure 2. Map of the activity locations in the Grassy Mountain project area.

### 5.1.3. Activities to be Implemented in the Grizzly Mountain Project Area

Information about specific treatment units in the Grizzly Mountain Project Area is displayed in Table 3, below. In addition to the treatments identified in the table below, 72 acres of ecoburning will occur adjacent to Unit 1 and between Units 6-11 from the ridgeline to the road. Understory removal harvest treatments will occur within the ecoburn areas prior to implementation of the burning. The understory removal harvest will remove smaller merchantable trees not expected to survive the ecoburn. Generally, this will involve trees less than 12 inches in diameter, depending on the species. Fading trees from root disease, beetles, and other causal agents will also be salvaged in this operation. Older dead beetle mortality will be retained on site for wildlife habitat. Timber will be removed from these ecoburn areas using helicopter-yarding systems.

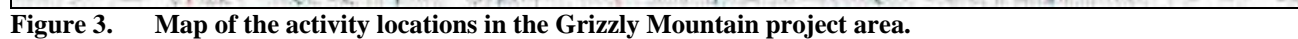
Approximately 0.1 miles of system road considered “in storage” (no longer used for motorized public access) will be used to access a suitable helicopter landing. This road had been ripped and barriered but has not brushed in. This roadway will be put back in storage after completion of use.

**Table 3. Specific Unit Information for the Grizzly Mountain Project Area.**

Unit	Acres	Treatment	Volume (mbf <sup>1</sup> )	Yarding	Fuels Treatment <sup>2 and 3</sup>	Planting
1	4	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
2	4	Group Shelterwood	25	Helicopter	Jackpot	White pine/ Larch
3	2	Group Shelterwood	15	Helicopter	Jackpot	White pine/ Larch
4	2	Group Shelterwood	15	Helicopter	Jackpot	White pine/ Larch
5	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
6	2	Group Shelterwood	15	Helicopter	Jackpot	White pine/ Larch
7	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
8	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
9	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
10	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
11	3	Group Shelterwood	20	Helicopter	Jackpot	White pine/ Larch
12	4	Sanitation/Salvage	20	Helicopter	Lop & Scatter	None
13	5	Sanitation/Salvage	20	Helicopter	Lop & Scatter	None
14	14	Sanitation/Salvage	60	Helicopter	Lop & Scatter	None
<b>Total</b>	<b>55</b>		<b>310</b>			
Underburn area	72	Understory removal	165	Helicopter	Ecoburn	None

<sup>1</sup> mbf = thousand board feet





#### 5.1.4. Activities to be Implemented in the Dobson Pass Project Area

Information about specific treatment units in the Dobson Pass Project Area is displayed in Table 4, below. Within the Dobson Pass project area, Units 2 and 3 are identified for commercial thinning, with the objective of improving the health and vigor of western larch in these stands. Approximately one-third of the existing basal area would be harvested, focusing on the removal of shade tolerant species such as Douglas-fir, grand fir, and western hemlock less than 16 inches in diameter within 20 feet of western larch trees. This treatment will reduce competition and improve tree vigor on the site. Larch with less than 20% live crown or with heavy mistletoe may also be removed if within 20 feet of an acceptable leave tree. Slash will be treated with lop and scatter treatments to get fuels on the ground so they will decompose more quickly.

Dobson Pass Units 6 and 8 are identified for improvement harvests. The objective of this treatment is to improve the health and vigor of ponderosa pine and to restore a more open stand structure associated with historic disturbance regimes. Shade tolerant species, primarily Douglas-fir and grand fir less than 16 inches in diameter within 25 feet of ponderosa pine will be harvested. This “daylighting” treatment will only occur if the ponderosa pines have adequate crowns capable of responding to the improved light and moisture regimes. If western larch occurs in these areas, it will also be daylighted. Jackpot burning will be utilized in these areas to treat slash and enhance ecosystem conditions.

**Table 4. Specific Unit Information, Dobson Pass Project Area.**

Unit <sup>1</sup>	Acres	Treatment	Volume (mbf <sup>2</sup> )	Yarding	Fuels Treatment	Planting
1	10	Group Shelterwood	60	Skyline	Underburn	Larch/white pine
2	28	Commercial thin larch	80	Skyline	Lop and scatter	None
3	5	Commercial thin larch	20	Skyline	Lop and scatter	None
4	5	Group Shelterwood	40	Heli	Jackpot	Ponderosa pine/larch/white pine
5	12	Group Shelterwood	90	Heli	Jackpot	Ponderosa pine/larch/white pine
6	9	Improvement Harvest	55	Skyline	Jackpot	None
8	8	Improvement Harvest	40	Skyline	Jackpot	None
<b>Total</b>	<b>77</b>		<b>385</b>			

<sup>1</sup> Dobson Pass Unit 7 was dropped under all alternatives due to concerns for wildlife habitat.

<sup>2</sup> mbf = thousand board feet



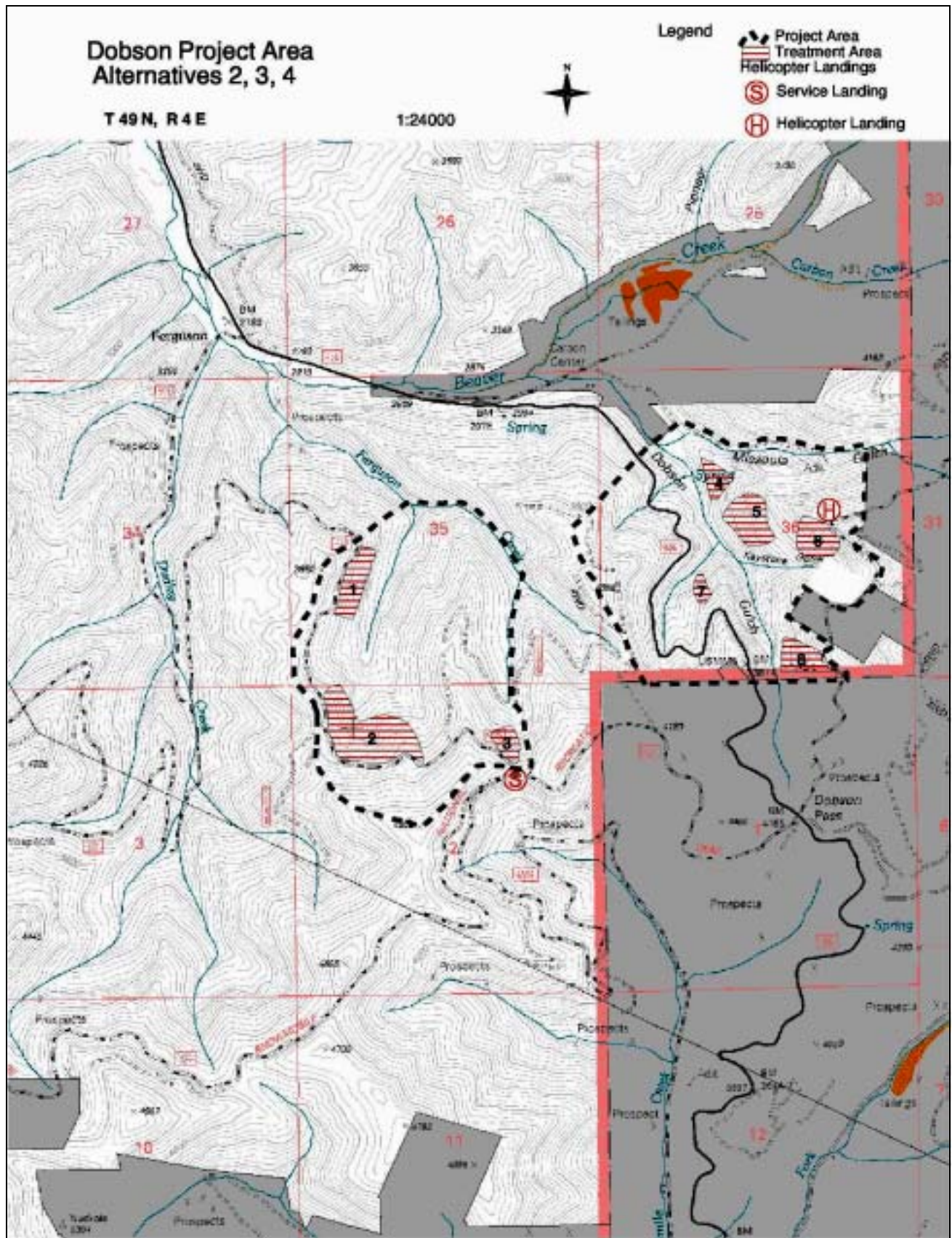


Figure 4. Map of the activity locations in the Dobson Pass project area.

## **5.2 Features Designed to Protect Aquatic Resources (EA, p. 2-20, 2-21)**

In development of the action alternatives, standards and guidelines of the Inland Native Fish Strategy were used specifically to protect water and aquatic biota within the Resource Area. Riparian Habitat Conservation Areas (RHCAs), known locations of sensitive plants and special wildlife habitat areas were excluded from proposed timber harvest or fuel treatment activities. Standard widths for defining interim Riparian Habitat Conservation Areas (RHCA's) were utilized with no modifications. Riparian Management Objectives and road management standards and guidelines were applied within the Resource Area boundary on those roads used for harvesting or hauling of timber. Streamside buffers will be applied along all harvest units under the Selected Alternative. The intent of the buffers are to meet the riparian management objectives of maintaining slope stability in potentially sensitive areas, maintain stream temperatures and provide a long-term supply of large woody debris. A 150-foot no-harvest buffer will be maintained along Dobson Gulch. A 75-foot no-harvest buffer will be maintained along Keystone Gulch and all intermittent seasonal flowing streams and channels scattered throughout the project areas. There is no instream work proposed with this project, therefore timing restrictions will not be necessary.

To minimize erosion and ensure compliance with State water quality standards, all road use and timber harvest associated with the Hither and Yon Beetle project will be completed using Best Management Practices (BMPs). The Forest Service Handbook 2509.22 (Soil and Water Conservation Handbook) outlines BMPs that meet the intent of the water quality protection elements of the Idaho Forest Practices Act. Forest Plan monitoring includes the monitoring of BMPs to check that they are applied and implemented as designed, that they are effective in controlling non-point sources of pollution, and are protecting water quality and beneficial uses as intended (2001 Forest Plan Monitoring Report, page 27). Soil and water conservation practices, identified in the Soil and Water Conservation Handbook, are standard provisions to timber sale contracts (USFS Timber Sale Contract - Division B, 2400-6). Activities will meet or exceed rules and regulations of the Idaho Forest Practices Act, (BMPs, and the Idaho Forestry Act and Fire Hazard Reduction Laws (1988).

## **5.3 Features Related to Vegetation Management (EA, p. 2-21)**

All harvest units are on sites determined to be suitable for timber production. Within 5 years of regeneration treatment, site preparation for regeneration, fuel treatment and planting will occur. In approximately 10 to 30 years the stands proposed for regeneration (the group shelterwood harvest units) may be entered for pre-commercial thinning, pruning, cleaning and possibly fertilization to meet target stand and management area guidelines. Access for stand-tending purposes is available in these areas.

## **5.4 Features Designed to Protect Air Quality (EA, p. 2-21)**

The Idaho Panhandle National Forests are party to the North Idaho Smoke Management Memorandum of Agreement, which established procedures regulating the amount of smoke produced from prescribed fire. The North Idaho group currently uses the services and procedures of the Montana State Airshed Group. The procedures used by the Montana Group are considered to be the "best available control technology" by the Montana Air Quality Bureau for major open burning in Montana. A Missoula-based monitoring unit is responsible for coordinating prescribed burning in North Idaho during the months of April through November. This unit monitors meteorological data, air quality data, and planned prescribed burning and decides daily on whether or not restrictions on burning are necessary the following day.

A list of all prescribed burning planned for the burning season on the Coeur d'Alene River Ranger District is forwarded to the monitoring unit through the Idaho Panhandle National Forest fire desk before March 1. Daily, by 8:30 a.m., the Coeur d'Alene River Ranger District informs the fire desk of all burning planned for the next day and the fire desk forwards this information to the monitoring unit. By 3:00 p.m. the same day the monitoring unit informs the Forest if any restrictions are to be in effect the following day, and the fire desk informs the District. These procedures limit smoke accumulations to legal, acceptable limits.

Historically, prescribed burning on the Coeur d'Alene River Ranger District occurs in the spring and fall seasons over a total time span of 45 to 60 days during each season. All burning complies with federal, state and local regulations. Management practices include, but are not limited to, burning under spring-like conditions (high moisture content in fuels, soil and duff) to reduce emissions, provide for retention of large woody debris, and to protect the soil.

Prescribed burning during spring or fall will generate less smoke than a much hotter stand replacing summertime wildfire.

### **5.5 Features Designed to Protect Soil Productivity (EA, p. 2-21, 2-22)**

Some compaction will occur in association with approximately 13 acres of tractor skidding. To minimize ground disturbance, skid trails will be designed to be 120 feet apart (except where converging). Skid trails in Grassy Unit 9 will be decompacted. There are no units located where existing soil conditions would not meet Forest Plan soil quality standards before or after harvest. Minor soil disturbances will occur within skyline and cable units. Ground disturbance in helicopter units will be minimal. None of the harvest units are located on geologic formations known to be lacking in potassium feldspar. In areas of underburning, limbs and tops will be required to be left in the woods prior to yarding. The slash will remain on site over winter prior to burning to allow nutrients to leach from the material. To protect soil horizons, burning will occur when soil moistures are higher than summer months. In all other units, slash will be lopped and scattered. Using recommendations of the Intermountain Forest Tree Nutrition Cooperative will maximize partible potassium on the sites.

### **5.6 Features Designed to Protect Wildlife Habitat (EA, p. 2-23)**

Patches of beetle-killed timber have been excluded from harvest consideration within and adjacent to the project area. Live leave trees in regeneration and rehabilitation areas would be reserved from harvest to provide size class diversity and long-term snag recruitment. Snags will be retained in accordance with the Northern Region Snag Management Protocol (USDA Forest Service, 2000). The Northern Region Snag Protocol calls for greater snag retention than identified under Forest Plan standards. In proposed harvest units that currently contain quality snag densities, 2 to 4 of the largest dead trees per acre would be maintained. Some smaller unmerchantable dead trees would also be retained to achieve the 6 to 12 snags per acre identified for these habitat types under the Snag Protocol Guidelines.

Several birds of prey are identified for special protection measures on the Idaho Panhandle National Forests. If active flammulated owl nest sites are found, the Forest Service may cancel timber harvest and yarding activities within 200 feet of the nest site. Unit 5 in the Grassy Mountain area will be surveyed for goshawk prior to implementation. If active goshawk nest sites were found, the nest site would be protected with a 30-acre no-harvest buffer. No tree felling, yarding or other potentially disturbing activities would occur within approximately one-quarter mile of the nest site from March 15 to August 15. These protective measures are based on Management Recommendations for the Northern Goshawk in the Southwestern United States (1992) and would be incorporated into timber sale packages using the appropriate timber sale contract clauses. Any trees that are bole-scorched during site preparation burning operations would be retained on site for black-backed woodpecker habitat.

In all harvest units it will be necessary to retain some down logs in order to protect long-term site productivity, maintain soil organic matter and provide wildlife habitat. On moist sites, 15 to 20 logs or down trees per acre would be retained on the site. On dry sites, 3 to 6 logs or down trees would be retained. These logs would be at least 12 inches in diameter and 6 feet long. Graham et al recommend minimum levels of woody debris to sustain soil productivity and faunal use of this forest floor substrate. The Northern Region Snag Management Protocol discussed earlier provides snag retention recommendations to assure that the functions of these important components are effectively protected.

The gate on Road 1564 in the Grassy Mountain area will be opened for sale activities; to reduce disturbance to wildlife, the gate will be closed at the end of each day's activities.

### **5.7 Features Designed to Protect TES Plant Habitat (EA, p. 2-23)**

No harvest activity will occur which would adversely affect any known rare plant population. All populations potentially adversely affected will be buffered from harvest activity by a minimum of 100 feet. No harvest activity will occur within riparian habitat. All newly identified threatened and sensitive plant occurrences will be evaluated. Specific protection measures will be implemented to minimize impacts to that population occurrence and its habitat. Surveys in areas of high potential habitat were completed in July 2002; no Threatened or Endangered plants were found. The timber sale contract will also contain provision C6.251, which allows for modification of the contract if protection measures prove inadequate, if new areas of plants are discovered, or if new species are added to the list. (Please refer also to Section 5.10, "Mitigation".)

## **5.8 Features Designed to Protect Recreational Use (EA, p. 2-23)**

Contract provisions will be included to protect public safety (see the public safety discussion under Issues Not Discussed in Detail in Appendix A). In addition, log hauling will be prohibited on Forest roads on weekends and holidays. To avoid impacts to winter recreational use, logging operations will be prohibited during the period December 1 through March 31 in the Grassy Mountain project area and along Road 429 in the Dobson Pass area.

## **5.9 Features Designed to Protect Heritage Resources (EA, p. 2-23)**

All of the treatment areas are within areas previously surveyed for heritage resources. All known heritage resource sites will be protected as directed by the Cultural Resources Management Practices (Forest Plan, Appendix FF). Any future discovery of heritage resource sites or caves would be inventoried and protected if found to be of cultural significance. A decision would be made to avoid, protect, or mitigate effects to these sites in accordance with the National Historic Preservation Act of 1966.

## **5.10 Mitigation (EA, p. 2-24)**

The Environmental Assessment identified the specific mitigation measures necessary to fulfill the determination of effects in the Biological Evaluation for sensitive plants:

- All previously unsurveyed areas identified as highly suitable habitat that, as a result of the proposed activity, would have a high risk of adverse effects to proposed, Threatened or Sensitive plant populations or habitat must be surveyed prior to project implementation. Some areas previously surveyed may be resurveyed, based on the date and intensity of the most recent survey and the risk to habitat from proposed activities. If rare plants are discovered prior to or during project implementation, the occurrence will be evaluated by the District Botanist and actions taken as necessary to ensure to population viability is protected (this could include dropping or modifying activities). To help limit the spread of weeds in the project areas, contract provisions will be used that require the cleaning of heavy equipment. Certified noxious weed-free grass seed mix will be sown whenever soil disturbance results from project activities. Any straw and/or hay used as mulch during project activities is required to be certified noxious weed free.
- Grassy Mountain Unit 5 and Grizzly Mountain Units 11, 12, and 13 will be surveyed for moist guild sensitive species prior to implementation. Grizzly Mountain Units 2 and 3 and Dobson Pass Units 4, 5, 6, and 8 will be surveyed for dry guild sensitive species prior to implementation of this alternative. It is also recommended that the entire dry guild habitat in the vicinity of Grizzly Mountain Units 1, 2, and 3 and areas adjacent to Dobson Pass Units 4, 5, 6, and 8 be surveyed for dry guild species. Extra precautions could be employed during burning operations if plants are discovered in these adjacent areas. The above listed dry guild units and adjacent areas will also be surveyed for Spalding's catchfly. Approximately 3 acres of dry guild habitat will be surveyed above Grizzly Mountain Unit 1 prior to implementation of the understory removal or ecoburning treatment.
- Areas to be surveyed may be adjusted as project design and layout progresses, to assure all activity areas are covered by surveys, and for efficiency in completing the surveys. Specific features of the alternatives (EA, Chapter 2, Features Common to All Alternatives) will be implemented to protect any newly documented population and its habitat. Should rare plants be located prior to or during implementation, all newly identified occurrences will be evaluated, and one or more of the following protective measures implemented: 1) drop units from activity; 2) modify the unit or activity; 3) implement a minimum 100 feet (slope distance) buffer around sensitive plant occurrences as needed to minimize effects and maintain population viability; and/or 4) implement timber sale contract provisions for "Protection of Endangered Species" and "Settlement for Environmental Cancellation." Effectiveness of these measures are estimated by the District botanist to be "high," because surveys are conducted by trained botany personnel and any discovered habitat or populations are protected by physical buffers where ground-disturbing activities are not allowed.

*Plant surveys in the Hither and Yon project area were completed in July 2002; no rare plant occurrences were found (please refer to Section 6.15.2, items 5, 6 and 8 for additional information).*



## **5.11 Schedule of Activities**

Depending upon availability of funding and operating schedule, timber harvest will likely occur in 2003, followed by prescribed burning in 2004 and tree planting in 2005. Please refer to the Environmental Assessment, Chapter 3, Finances, for a discussion of the types of funding.

## **5.12 Monitoring**

### **5.12.1 Forest Plan Monitoring**

The Forest Plan documents a system to monitor and evaluate Forest activities. The monitoring and evaluation process compares the end results that have been achieved to the projections made in the Forest Plan. Monitoring and evaluation each have distinctly different purposes and scope. In general, monitoring is designed to gather the data necessary for project evaluation. During evaluation of project effectiveness, data provided through the monitoring effort are analyzed and interpreted. This process will provide periodic data necessary to determine if implementation is within the bounds of the project design (Forest Plan, page IV-7).

The Forest Plan identifies 22 monitoring and evaluation items. Of these, 12 items must be reported every year, 1 item must be reported every 2 years, and the remaining 9 are reported every 5 years. The last time that all 22 items were reported was Fiscal Year 1998. Annual monitoring reports have been published on the Idaho Panhandle National Forest since 1988. When available, monitoring results have been used to identify conditions and trends in the Hither and Yon project area, as noted in the Environmental Assessment and this Decision Notice. The Selected Alternative is consistent with specific monitoring requirements identified by the Forest Plan (Forest Plan, Chapter IV), as documented in the Environmental Assessment (by resource discussion in Chapter 3). For further information, please refer to Section 6.7 (Findings and Consistency With Laws, Regulations and Policy - Forest Plan for the Idaho Panhandle National Forests) and Section 6.15.1 (National Forest Management Act, Forest Plan Consistency).

### **5.12.2 Forest Corporate Monitoring**

In December 1999, the Ecosystem Team for the Idaho Panhandle National Forests facilitated development of a Corporate Monitoring System. The emphasis is on monitoring our progress in restoring the ecosystems of the Idaho Panhandle and in being more consistent in the way we analyze effects to the ecosystems. The monitoring is tied closely to findings of the Interior Columbia Basin and Coeur d'Alene Geographic Assessments. The data tracked for long-term monitoring and the anticipated project-related changes to the ecosystem conditions is provided in Table A-1 of Attachment A.

## **5.13. Summary of Decision Rationale**

Alternative 3 represents the greatest amount of accomplishment on the ground for the least costs. Based on the amount and type of fuels treatment (EA, pages 2-28, 3-35), Alternative 3 (as modified) will best meet Forest Plan goals, objectives and standards for fuels management based on the amount and type of fuels treatment, introducing more fire back into the ecosystem than would the other alternatives, and providing the best protection against escaped fire during prescribed fire treatments within harvest units (EA, page 2-28). The understory salvage treatment will help finance the ecoburn and will utilize material that would otherwise be killed during the burning operation (EA, pages 2-26, 2-28, and 3-39).

Alternative 3 will also provide the greatest net economic return after all costs are subtracted (EA, page 2-28). Activities under Alternative 3, as modified, can be implemented and the objectives met without resulting in any measurable effects to aquatic resources (EA, pages 3-56 through 3-59).

## **6. Findings And Consistency With Laws, Regulations And Policy**

Numerous laws, regulations and agency directives require that my decision be consistent with their provisions. The following discussion is not an all-inclusive listing, but is intended to provide information on the areas raised as issues or comments by the public or other agencies.

## **6.1 National Environmental Policy Act (EA, p. 2-1)**

The National Environmental Policy Act (NEPA) requires analysis of projects to ensure the anticipated effects upon all resources within the project area are considered prior to project implementation (40 CFR 1502.16). The analysis for the Hither and Yon Beetle project followed the guidelines of NEPA as provided by the Council on Environmental Quality (CEQ). Alternatives were developed based on existing conditions, Forest Plan goals and objectives, and public concerns and recommendations. A total of four alternatives were considered in detail (EA, pages 2-10 through 2-19, “Alternative Descriptions”), including a no-action alternative as required by NEPA and NFMA; an additional eight alternatives were briefly considered but eliminated from further study (EA, page 2-7). The range of alternatives is appropriate given the scope of the proposal and the purpose and need for action (EA, pages 1-1, 1-2).

## **6.2 Natural Resources Agenda (EA, p. 2-1)**

On March 2, 1998, Forest Service Chief Mike Dombeck announced the Forest Service Natural Resource Agenda. The Agenda provides the Chief's focus for the Forest Service, and identifies specific areas where there will be added emphasis, including:

- *watershed health and restoration*
- *forest road policy*
- *sustainable forest management*
- *recreation*

As stated in the EA (page 2-1), the activities to be implemented under the Selected Alternative have been designed to be consistent with the goals and tentative direction provided under the Natural Resources Agenda to date. The purpose and need for this project is to recover the economic value of dead and damaged timber and to promote long-term vegetative objectives in areas of high timber mortality. A watershed restoration-only alternative was considered but dismissed from further consideration because it would not meet the purpose and need for this project and because considerable watershed restoration activities have already occurred in this area (EA, pages 2-7, 3-42, and A-15).

Forest road management is tiered to the Forest Plan (EA, page A-9), and takes into consideration the proposed Forest Service Road Management and Transportation Rule and Roadless Area Conservation Policy, as discussed later in this Decision Notice.

Regeneration harvests are proposed for most stands in which a large component of the overstory stand basal area has been lost to bark beetles or other causal agents such as root disease and ice or snow damage (EA, page 3-16). Following site preparation, regenerated stands will be planted with white pine, larch, and ponderosa pine to promote stand structures and species composition that reduce susceptibility to insect and disease damage. This is consistent with Forest Plan direction and the Natural Resources Agenda in terms of sustainable forest management.

The timber harvest and fuels treatment activities will likely cause some disturbance or interruptions to recreation visitors, but the disturbances will be of a temporary nature (EA, pages A-10, A-11). No developed recreation sites will be directly affected. Indirect effects might include the sounds of helicopters and logging trucks passing a recreation site. Recreation experiences may have to be achieved in another area of the forest setting until activities are complete. Activities will be accomplished using safety standards based on the Forest Service's Health and Safety Code Handbook (EA, page A-9, “Public Safety”). Logging operations would be prohibited during the winter recreational period from December 1 to March 31 on Roads 260, 271 and 424 since they are part of the groomed snowmobile route system.

## **6.3 Forest Service Road Management and Transportation System Rule (EA, p. 2-2)**

On January 28, 1998, in an Advance Notice of Proposed Rulemaking (63 FR 4350), the Forest Service announced its intent to revise regulations concerning management of the national forest transportation system. In January 2001, the Forest Service issued a Final Rule regarding specific revisions to the road system rules at 36 CFR part 212 and to Forest Service administrative directives governing transportation analysis and management.

The roads policy provides basic procedural protection for inventoried roadless areas and contiguous unroaded areas from road building until the Roadless Area Conservation Rule (discussed below) becomes effective, and the Forest completes a forest-scale roads analysis and incorporates it into the Forest Plan.

One of the tools developed to meet objectives of the revised policy is an integrated, science-based roads analysis process that allows objective evaluation of the environmental, social and economic impacts of proposed road construction, reconstruction, maintenance, and decommissioning (USDA Forest Service, 1999, Misc. Rep. FS-643). The six-step process does not make decisions nor allocate lands for specific purposes. Rather, the analysis identifies and addresses a set of possible issues and applicable analysis questions that, when answered, produce information for forest line officer consideration about possible road construction, reconstruction, and decommissioning needs and opportunities.

Due to the small scope of this project, the small amount of existing roads, the recently upgraded condition of these roads, and the absence of new road construction, and the small amount (one-tenth of a mile) of road reconstruction, there was no need to do a thorough road analysis under the Roads Analysis Policy for this project area (Project Files, Transportation). The Coeur d'Alene River Ranger District Access Management Assessment (USDA Forest Service, 2000) was used to determine system roads within the planning area. For additional information, please refer to the Environmental Assessment (page A-9).

#### **6.4 Roadless Area Conservation Rule (EA, p. 2-3)**

On October 13, 1999, President Clinton directed the Forest Service to develop a proposal for managing some 50 million acres of roadless areas in the National Forests. The Roadless Area Conservation Rule was published in the Federal Register on January 5, 2001, and was to become effective May 12, 2001. On May 10, 2001, the Idaho U.S. District Court preliminarily enjoined the Forest Service from implementing the Roadless Area Conservation Rule.

There are no lands in or immediately adjacent to the Hither and Yon Project Areas identified as inventoried roadless. There will be no change to road access in relation to inventoried roadless areas under any alternative.

#### **6.5 Interior Columbia Basin Ecosystem Management Project (EA, p. 2-3)**

This analysis was guided by integrated ecological assessments and strategies that began in 1993 by direction from President Clinton to “develop a scientifically sound and ecosystem-based strategy for management of eastside forests.” This direction resulted in the combined Bureau of Land Management and Forest Service project known as the Interior Columbia Basin Ecosystem Management Project (ICBEMP).

The Hither and Yon Project Areas are in ICBEMP Forest Cluster #4, which emphasizes reducing risk to ecological integrity and species viability (USDA Forest Service, 1996, Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin). The primary risks to ecological integrity within Forest Cluster #4 are risks to hydrologic and aquatic systems from fire potential, risks to late and old forest structures in managed areas, and risks in forest compositions that are susceptible to insect, disease, and fire (Integrated Scientific Assessment, page 113). Treatment activities in the Hither and Yon Project Areas will address these three primary risks in a manner consistent with Chapter 8 of the Integrated Scientific Assessment. The effectiveness of each alternative in addressing those risks is discussed for each appropriate resource in Chapter 3 of the EA (in the Aquatic Resources, Forest Vegetation, and Fire/Fuels sections).

A Final EIS for the Interior Columbia Basin project was released in December 2000, with a “proposed” decision. Once a Record of Decision is signed, National Forests and BLM Districts will begin implementing the new strategy. Although the scientific findings of the ICBEMP are not part of the Forest Plan for the Idaho Panhandle National Forests, they are expected to provide guidance for the revision of the Forest Plan. No decisions or guidelines for analysis were made exclusively on this information; however, the science behind the ICBEMP is used in the analyses for the Hither and Yon project. When available, information and direction provided in the ICBEMP Record of Decision will be reviewed to determine whether a correction, supplement, or revision to the Hither and Yon EA is necessary, in compliance with Forest Service Handbook 1909.15 (Chapter 18).

## **6.6 Northern Region Overview (EA, p. 2-4)**

Findings of the Northern Region Overview assessment conclude that there are multiple areas of concern in the Northwest Zone of the Region, but that "this subregion holds the greatest opportunity for vegetation treatments and restoration with timber sales. From a social and economic standpoint, using timber harvest for ecological restoration would be a benefit to the many communities which still have a strong economic dependency, more so than in other zones in the Region. Aquatic restoration should be focused on specific needs based on the zone aquatic restoration strategy." The timber management (timber harvest) tool best fits with the forest types in northern Idaho and is essential, for example, to achieve the openings needed to restore white pine and larch, and maintain upland grass/shrub communities.

The timber harvest, vegetation restoration, and fuels treatment activities that will occur under the Selected Alternative are consistent with the findings and recommendations of the Northern Region Assessment.

## **6.7 Forest Plan for the Idaho Panhandle National Forests (EA, p. 2-5)**

General management direction for the Idaho Panhandle National Forests is found in the Forest Plan, which provides Forest-wide goals and objectives (Forest Plan, Chapter II). The standards and guidelines for the Forest Plan (Forest Plan, Chapter II) apply throughout the Resource Area. In development of the alternatives, standards and guidelines of the Inland Native Fish Strategy were used specifically to protect water and aquatic biota within the Project Areas. The Inland Native Fish Strategy was prepared in July 1995, to provide interim direction to protect habitat and populations of resident native fish outside of anadromous fish habitat in eastern Oregon, eastern Washington, Idaho, western Montana, and portions of Nevada (USDA Forest Service, 1995). Under the authority of 36 CFR 219.10(f), the decision amended Regional Guides for the Forest Service's Intermountain, Northern, and Pacific Northwest Regions and Forest Plans in the 22 affected Forests, including the Idaho Panhandle National Forest. For more specific information, please refer to Section 2.6.2.A – Features Designed to Protect Aquatic Resources.

I have evaluated features of the Selected Alternative against Forest Plan goals and objectives, as well as the resource standards for consistency with the Forest Plan. The Forest Plan is discussed briefly in Chapter 2 of the EA (page 2-5), with disclosure of consistency with Forest Plan standards for each resource in Chapter 3 of the EA. All management activities included in the Selected Alternative are in full compliance with and generally exceed Forest Plan goals, objectives and standards, including the Inland Native Fish Strategy amendment to the Forest Plan. **For additional discussion of consistency with the Forest Plan, please refer to the discussion under "National Forest Management Act," in this Decision Notice.**

## **6.8 Coeur d'Alene River Basin Geographic Assessment (EA, p. 2-5)**

The Geographic Assessment for the Coeur d'Alene River basin provides a description of the historic and current ecological, social, and economic conditions of the subbasin. The recommendations and strategies presented in the Geographic Assessment were based on three major groups of findings: social and economic, landscape and terrestrial, and aquatic. The findings of the assessment proved to be consistent with the findings of the Upper Columbia River Basin findings at the next scale down. To identify the overall strategy for the Coeur d'Alene River Basin, the terrestrial, watershed, wildlife and recreation (sense of place) maps were overlaid. The highest priority for active restoration becomes 1) non-functioning watersheds with serious terrestrial problems; and 2) functioning-at-risk watersheds with serious terrestrial problems (Geographic Assessment, pages 62-65).

The Selected Alternative, though small in scope, does reintroduce seral species such as western white pine, ponderosa pine, and larch back into the ecosystem in areas of high timber mortality; and treatments (such as larch thinning and improvement harvests) designed to maintain existing ecosystem attributes of that nature. The geographic assessment refers to the substantial reduction that has occurred to component and the need to restore this vegetative component back into the ecosystem.

## **6.9 Endangered Species Act (ESA) (EA, pp. 3-60, 3-74, 3-75, 3-91)**

Within Section 7, federal agencies are required to carry out programs to conserve Endangered and Threatened species. Consultation is required to ensure that any action authorized, funded or carried out by a Federal agency is not likely to

jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. The Coeur d'Alene River District Wildlife Biologist, Fisheries Biologist, and Botanist evaluated the Selected Alternative (Alternative 3) in regard to Threatened and Endangered wildlife, fish and plant species. Findings are disclosed in the EA (Chapter 3 and Appendix A) and in the Biological Assessment and Evaluations (Project Files), and summarized briefly below. US Fish and Wildlife Service reviewed our analysis and determination of effects, and concurred with our findings (Project Files, BE/BA). Additional discussion of species viability is provided in Attachment B.

- **Wildlife:** Grizzly bears: *There will be no effect to grizzlies because the project areas are not within a grizzly bear recovery area; the grizzly bear is not likely to occur on the district; and the activities will not result in the long-term degradation of grizzly bear habitat (EA, page A-2).* Gray wolves: *This project will have a minor increase in short-term disturbance and could affect the wolf's prey base by temporarily displacing big game. However in the long term, there will be no substantial change to road densities or habitat capability of the area. Since the scope of this project is small and generally of short duration, activities may affect individuals but will not likely adversely affect gray wolf populations (EA, page A-2).* Bald eagles: *There will be no effect to bald eagles, because none of the proposed harvest units or helicopter flight paths will affect potential bald eagle habitat; and the nearest unit, helicopter or service landing will be over 3 miles from any suitable nesting sites in the Coeur d'Alene River corridor area (EA, pages A-2, A-3).* Lynx: *Activities in the Grassy Mountain and Grizzly Mountain project areas, though small in scope, may affect individual lynx due to proximity to habitat conservation areas, but will not likely adversely affect populations. Activities in the Dobson Pass area will have no effect on lynx or their habitat (EA, page A-3).*
- **Fish:** *Neither white sturgeon or their habitat are found presently or historically within the project area or any watershed potentially affected by this project. Bull trout (*Salvelinus confluentus*) have been found in the Coeur d'Alene River and Lake (Idaho Fish and Game, 1989); however, no bull trout have been found during fish surveys in the Upper Tepee, Grizzly or Beaver Creek drainages. An evaluation of effects to fisheries was completed as described in the Environmental Assessment (Water Resources/Fisheries) and Biological Assessment (Project Files, BE/BA). There would be no effect to bull trout as a result of implementing the Selected Alternative, and the existing rate of habitat recovery for Threatened and Endangered fish species will be maintained.*
- **Plants:** *There will be no effect to the Threatened plant species water howellia (*Howellia aquatilis*) or Ute ladies-tresses (*Spiranthes diluvialis*), because there is a lack of suitable habitat in the project areas for these species (EA, page B-6). There is potential habitat for Spalding's catchfly (*Silene spaldingii*); individuals and habitat of this species may be impacted by ground-disturbing activities. Alternative design features and mitigation measures for Threatened and Sensitive plants will protect populations and species viability, although there may be some minor effects to habitat and possibly isolated individuals (EA, page B-6). Surveys were completed in July 2002, no rare plants were found (Project Files, BA/BE's).*

Based on these determinations, I find the Selected Alternative is consistent with the Endangered Species Act. Additional discussion of effects to wildlife, fish and plant species is provided in Sections 6.15.1 (Forest Plan Consistency) and 6.15.2 (Resource Protection).

## **6.10 Clean Air Act (EA, p. 2-21, A-7)**

The Forest-wide standard for air quality is to coordinate all Forest Service management activities to meet the requirements of the State Implementation Plans, Smoke Management Plan and Federal air quality standards (Forest Plan, page II-9). This will be done under the Selected Alternative, and burning will be conducted in a manner that will meet air quality requirements (EA, p. 2-21).

The monitoring of air pollutants during prescribed burning seasons is used to eliminate burning during times when such activities would result in violations of the State standards, including unacceptable impacts to non-attainment areas. The North Idaho/Montana Airshed Group monitors smoke management for air quality; the Forest Service voluntarily ceases burning operations to avoid violation of State standards. The Idaho Panhandle National Forests coordinate and schedule burning activities to maintain air quality. Burning plans addressing smoke management are prepared by qualified personnel. The Coeur d'Alene River Ranger District implements burning projects in Airshed

#11. The monitoring of air pollutants during prescribed burning periods has not recorded any violations of the State standards to date.

Because use of prescribed fire will be based on these smoke management guidelines, current air quality standards will not be exceeded (EA, page A-7). Over the long-term, prescribed fire may reduce total particulates by reducing the risk of large wildfires that cannot be managed for emissions. This project meets the Clean Air Act and state monitoring requirements through coordination with the State prior to burning, and the use of burning techniques that minimize smoke emissions (Project Files, Air Quality).

### **6.11 Clean Water Act (EA, p. 3-40, 3-59, 3-60)**

The Clean Water Act (as amended, 33 U.S.C. 1323) directs the Forest Service to meet state, interstate and local substantive as well as procedural requirements with respect to control and abatement of pollution in the same manner and to the same extent as any nongovernmental entity. The Forest Service has the statutory authority to regulate, permit and enforce land-use activities on the National Forest System lands that affect water quality.

The Forest Service has agreements with the States to implement Best Management Practices (BMP) or Soil and Water Conservation Practices for all management activities to meet the objectives for Forest Practices. Monitoring would be designed to demonstrate the implementation of BMPs and provide feedback concerning their effectiveness in protecting water quality. Watershed conditions that contribute to water quality that is impaired would be improved through restoration projects and through scheduling of timber harvest and road building activities. Riparian areas would be managed to meet objectives for riparian-dependent resources (fish and wildlife habitats, water quality, stream channel integrity, vegetation, public water supplies).

Under authority of the Clean Water Act, the EPA and the States must develop plans and objectives (TMDLs) that will eventually restore listed stream segments. In lieu of those plans, Forest Service will demonstrate or find that their actions will not result in a net substantial increase in the pollutant of concern or prohibit or delay potential recovery (IDHW, 1997; USFS, 1995). The Selected Alternative is consistent with the Clean Water Act and Water Quality Limited Listings (EA, page 3-59, 3-60).

Based on the Water Resources and Fisheries effects analyses in Chapter 3 (pages 3-40 through 3-60, and 3-63 through 3-74), and measures outlined in the EA to protect soil and water resources (page 2-20 and 2-21), I find the Selected Alternative meets the requirements of the Clean Water Act.

### **6.12 Environmental Justice Act (EA, p. A-10)**

Executive Order 12898, issued in 1994, ordered federal agencies to identify and address the issue of environmental justice; i.e. adverse human health and environmental effects that disproportionately impact minority and low-income populations. Based on the composition of the affected communities and the cultural and economic factors, the Selected Alternative will have no adverse effects to human health and safety or environmental effects to minority, low-income, or any other segments of the population. Please refer to the Project Files, "Environmental Justice." There were no public comments related to environmental justice.

### **6.13 Recreational Fishing Act (EA, p. 3-74)**

Executive Order 12962 (June 7, 1995) identifies objectives to improve the quantity, function, sustainable productivity, and distribution of federal actions on aquatic systems and recreational fisheries, and document those effects.

The analysis and documentation provided in the Environmental Assessment meets the requirements of the Recreational Fishing Act. Information on the effects to aquatic systems is provided in the Water Resources section (pages 3-40 through 3-60). Information on the effects to fish species are discussed in the effects analysis and tables in the Fisheries section (pages 3-63 through 3-74). The analysis discusses both habitat and populations. As populations and habitat are affected, either negatively or positively, the recreational fishing should respond similarly. Since there is no measurable effect to the watershed under the Selected Alternative, there is no measurable effect to the fisheries resource.



## **6.14 National Fire Plan (EA, p. 2-1)**

In 2000, over 92,000 wildland fires burned more than 7.5 million acres of grass, brush and forested lands across the United States. In response, the Secretaries of the Departments of Agriculture and the Interior developed an interagency approach to respond to severe wildland fires, reduce their impacts on rural communities, and assure sufficient firefighting capacity in the future. The “National Fire Plan” identifies five key program areas designed to respond to the severe wildfires of 2000, to reduce their impacts on rural communities, and to enhance firefighting capabilities in the future. In Idaho, a total of over \$91.3 million has been allocated to these programs. Specific proposals were submitted by field units (such as Ranger Districts) for considerations. The Hither and Yon project is not a National Fire Plan proposal, therefore no discussion of the National Fire Plan was warranted in the Environmental Assessment.

## **6.15 National Forest Management Act (NFMA)**

The National Forest Management Act and accompanying regulations require that several other specific findings be documented at the project level. The following addresses our findings related to:

- *Forest Plan Consistency*
- *Resource Protection*
- *Vegetation Manipulation*
- *Silvicultural Practices*
- *Even-aged Management*

### **6.15.1 Forest Plan Consistency (36 CFR 219.1(b))**

Management activities are to be consistent with the Forest Plan [16 USC 1604 (i)]. The Forest Plan guides management activities [36 CFR 219.1(b)]. Consistency with the Forest Plan is discussed in more detail in Chapter 3 of the EA, by resource issue. The following provides a brief synopsis of consistency with the Forest Plan standards related to forest vegetation, fire and fuels, finances, watershed resources and fisheries, wildlife, scenery, and roadless areas.

**(1) Forest Vegetation:** Forest Plan direction provides that timber management activities will be the primary process used to minimize the hazards of insects and diseases and will be accomplished by maintaining stand vigor and diversity of plant communities and tree species (Forest Plan II-8).

In stands identified for treatment, harvest is primarily associated with the removal of dead and dying trees (EA, page 3-16, 3-24). This is consistent with Forest Plan direction that stands which are "substantially damaged by fire, wind throw, insect or disease attack, or other catastrophe may be harvested where the salvage is consistent with silvicultural and environmental standards" (Forest Plan II-32).

Regeneration activities are identified for stands in which the majority of the trees have been killed (EA, page 3-16, 3-24). Following site preparation, regenerated stands would be planted with seral species (white pine, larch, and ponderosa pine) to promote stand structures and species composition that reduce susceptibility to insect and disease damage. This is consistent with Forest Plan direction that "regeneration with species combinations that are least susceptible to root disease is the primary protection objective for the root rot diseases" (Forest Plan II-10) and that "reforestation will feature seral tree species" (Forest Plan II-32). All stands identified for regeneration harvests are on lands suitable for timber production and can be adequately restocked within 5 years of the final harvest (EA, p. 3-24; IPNF Monitoring, 1998, page 7). In accordance with Forest Plan direction, stands will be regenerated with trees from seed that is well adapted to the specific site conditions and will be regenerated with a variety of species.

There are no stands in which clearcutting was considered the optimal silvicultural treatment for the stand; no clearcutting will occur under the Selected Alternative (EA, page 3-24).

The Forest Plan states “openings created by even-aged silviculture will be shaped and blended to forms of the natural terrain to the extent practicable; in most situations they will be limited to 40 acres. Creation of larger openings must conform with current Regional guidelines” (Forest Plan II-32). The Northern Region Guide and FSM 2400-R1

Supplement 2400-96-3 state that “where natural catastrophic events such as fire, windstorms, or insect and disease attacks have occurred, 40 acres may be exceeded without 60 day public review and Regional Forester approval, provided that the public is notified in advance and the environmental analysis supports the decision” (FSM 2471.1). There are no stands proposed for treatment that would, either alone or in conjunction with existing created openings, exceed the 40 acre opening limitation (EA, page 3-25).

**(2) Fire and Fuels:** The goal of the Forest Plan is to provide efficient fire protection and fire use to help accomplish land management objectives (IPNF Forest Plan, Chapter II, pages II-10 and II-38). Under the Selected Alternative, fuels treatments will make progress toward reducing the potential intensities of wildfire, although at a small scale (EA, page 3-32). Ecoburning is expected to reduce the fire hazard in this area over the short term by creating a fairly large area with reduced fire hazards, fire intensities and rate of spread, and is expected to be beneficial over the long term by producing a more wildfire-resilient timber stand (EA, pages 3-32, 3-33). Reducing fire intensity in even small areas may improve the chances of firefighters to contain and control a small fire in conditions that could otherwise lead to a catastrophic fire occurrence (EA, page 3-33, 3-35).

**(3) Finances:** Forest-wide goals, objectives, and standards for finances are not specifically addressed in the Forest Plan. This issue is addressed indirectly in the discussion of community stability. Chapter II of the Forest Plan states, “Management activities will continue to contribute to local employment, income, and lifestyles. The Forest will be managed to contribute to the increasing demand for recreation and resource protection while at the same time continuing to provide traditional employment opportunities in the woods product industry,” (Forest Plan, page II-11, Objectives). The Selected Alternative will meet this Forest Plan direction because timber harvest will contribute (to a small extent) to the continuing operation of local mills, directly and indirectly enhancing the local and state economy through employment and tax revenues (EA, page 3-37).

**(4) Watershed Resources and Fisheries:** The Selected Alternative is consistent with Forest Plan Standards for water (Forest Plan, page II-33). There would be little impact to water resources due to project layout, methods and design. For example, the distance maintained between harvest units and the stream channel, and implementation of Best Management Practices (BMP’s). Models, field data, monitoring data, and professional judgment were used in the analysis to approximate the effects of activities on the water resource (EA, page 3-59).

The Inland Native Fish Strategy has been implemented as amendments to the Forest Plan of the Idaho Panhandle National Forests. The Selected Alternative is consistent with this direction (EA, page 3-59). The amendments require mitigation of environmental effects of management decisions. Specified riparian management goals and objectives have been developed, and Riparian Habitat Conservation Areas (RHCA) are defined and delineated. Riparian management and Riparian Management Objectives (RMO) are addressed using site-specific analysis and supportive data, and watershed analyses. The strategy also specifies standards and guidelines, which must be applied for certain activities in RHCAs. These are incorporated into the action alternatives as specified in Chapter 2 of the Environmental Assessment (page 2-20).

Standards and guidelines from Inland Native Fish Strategy were used specifically to protect water and aquatic biota within the project area (EA, pages 2-20, 3-59). Standard widths for defining interim Riparian Habitat Conservation Areas were utilized without modifications. The road management standards and guidelines were applied only to roads used or affected by the proposed project (timber sale, obliterated, closed or used for slash disposal or reforestation). The Road Management Objectives were applied only within the project area boundary, and only on those roads used for the harvesting or hauling of timber.

Forest Plan Standards 1 and 2 (for fry emergence) are no longer valid since the Inland Native Fish Strategy was developed, as explained in the EA (pages 3-72 and 3-73). This project complies with original Forest Plan direction because, although fry emergence was not computed, a detailed analysis of the effects to fish habitat and water resources was developed as required in Appendix I; and the project has been determined to be fully consistent with the INFS Forest Plan amendment and state water quality standards for supporting beneficial uses (see Watershed discussion).

Fish Standard 3 directs that streams listed under this standard of the Forest Plan will be managed as low access fishing opportunities to maintain a diversity of fishing experiences for the public and to protect sensitive fish populations. Special road management provisions will be used to accomplish this objective. This standard does not apply under this project, since none of these low access streams are within the project areas. See Forest Plan page II-30.

The Forest Plan also directs us to provide fish passage to suitable habitat areas by designing road crossings of streams to allow fish passage or by removing instream migration barriers (Forest Plan, page II-31, Fish Standard 4). The Selected Alternative would not build any new roads or create any new migration barriers. No migration barriers are known to exist on the proposed haul routes within National Forest jurisdiction; therefore there are no known opportunities to improve fish passage with this project (EA, page 3-68).

Fish Standard 5 (Forest Plan, page II-31) instructs us to utilize data from stream, river, and lake inventories to prepare fishery prescriptions that coordinate fishery resource needs with other resource activities, and to pursue fish habitat improvement projects to improve habitat carrying capacities on selected streams. Data and inventories have been and will continue to be collected on selected streams with other projects. Fish habitat improvement projects have been implemented and will continue to be a focus item across the Coeur d'Alene River Basin. The Hither and Yon project is not one of those proposals (EA, page 3-73).

Fish Standard 6 (Forest Plan, page II-31) directs us to coordinate management activities with water resource concerns as described in Management Area 16 (riparian corridors), Appendix I, and Appendix O of the Forest Plan. Design of the Selected Alternative was fully coordinated with the specifications found in the Forest Plan (Appendices I and O), and standards and goals stated for Management Area 16 (EA, page 3-73). Class I and II streams will receive protection beyond the requirements of the Forest Practices Act. The Selected Alternative was not designed to move all streams toward meeting Riparian Management Objectives. The project was designed to avoid entry into riparian areas (EA, page 3-73).

**(5) *Wildlife:*** Forest Plan standards relating to wildlife were incorporated into all alternatives (EA, page 3-91). These standards addressed elk and elk goals, Threatened and Endangered species, Sensitive species and old growth management. Elk habitat potential was calculated with a model that incorporates “Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho” as specified on page II-27 (Item 1c) of the Forest Plan. The Selected Alternative is consistent with Forest Plan management direction, goals, objectives, standards and guidelines for the management and protection of wildlife and species (EA, page 3-91).

**(6) *Scenery:*** The Selected Alternative will meet the assigned Visual Quality Objectives (EA, page A-12).

**(7) *Roadless Area:*** The Forest Plan directs that roadless areas be managed based on the direction and goals established for the respective management area within which they are located (Forest Plan, Chapter II, page II-4). There are no roadless areas in or immediately adjacent to these project areas (EA, page 2-3).

### **6.15.2 Resource Protection (36 CFR 219.27(a))**

The following statements address resource protection requirements of the National Forest Management Act:

***(1) Activities will conserve soil and water resources and will not allow significant or permanent impairment of the productivity of the land;***

**and**

***(4) Water bodies and their values are appropriately protected.***

At the tributary scale, no direct or indirect effects to beneficial uses are anticipated (EA, page 2-29). There would be no expected increase in sediment associated with activities. The only potential sediment generation would be associated with road maintenance, which is a practice that would normally occur even under the No-Action Alternative. The implementation of Best Management Practices and adherence to the Inland Native Fish Strategy standards and guidelines will provide protection for riparian habitat and control the majority of the sediment associated with these activities (EA, page 2-29).

The cumulative effects from management activities will not be measurable at the tributary or watershed scale for increases in peak flows or sediment over what would occur under the No-Action Alternative. Increase in flow will be primarily due to the mortality of trees from the Douglas-fir beetle or ice and snow damage. Additional harvest (commercial thinning, improvement harvests, understory removal, and to create conditions to allow site preparation and reforestation of low stocking sites) will not result in a measurable increase in magnitude or quantity of flows at the

tributary or watershed scale. No measurable effects will occur in stream channel conditions. Cumulative benefits due to past and ongoing watershed improvements and the reduction of sediment risk not associated with this project may be noticeable at the tributary scale and enhance stream conditions and water quality in some localized reaches (EA, page 2-29).

Alternative development was based in part on the “Soils Guidelines for NEPA Analysis” (Niehoff, 1998) and recommendations of the Intermountain Forest Tree Nutrition Cooperative (IFTNC) (EA, page A-7). To minimize erosion and ensure compliance with State water quality standards, timber harvest associated with the Selected Alternative will be completed using Best Management Practices (EA, pages 2-20, 2-21 and A-7). In development of the alternatives, standards and guidelines of the Inland Native Fish Strategy were used specifically to protect water and aquatic biota within the Resource Area (DN, page 5; EA, page 2-15). Streamside buffers will be applied along harvest units, in order to meet the riparian management objectives of maintaining slope stability in potentially sensitive areas, maintaining stream temperature, and providing a long-term supply of large woody debris. Please refer also to the Environmental Assessment, Chapter 3, Watershed Resources, and the Project Files, Soils.

***(2) Activities will not affect most potentially serious or long-lasting hazards (flood, wind, erosion, etc.).*** To minimize erosion and ensure compliance with State water quality standards, all road construction and timber harvest associated with this project will be completed using Best Management Practices (EA, page 2-20, 2-21). As stated above, cumulative effects from management activities will not be measurable at the tributary or watershed scale for increases in peak flow over what would occur under the No-Action Alternative. Under the Selected Alternative (and reasonably foreseeable activities), harvest of fir and hemlock, underburning in harvest units, and replanting with white pine and western larch will begin a trend toward reduced potential wildfire intensity and severity (EA, page 2-28). The Selected Alternative 3 will best meet Forest Plan goals, objectives and standards for fuels management, based on the amount and type of fuels treatment, and will also provide the best protection against escaped fire during prescribed fire treatments within harvest units (EA, page 2-28).

***(3) The timber resource will be managed consistent with the Forest Plan objectives of minimizing hazards due to insects and disease by maintaining stand vigor and diversity of plant communities and tree species.*** Timber harvest and associated reforestation will occur in stands where the majority of trees have been killed (EA, pages 3-16, 3-24). Following site preparation, stands will be planted with seral species to promote stand structure and species composition that reduce susceptibility to insect and disease damage (EA, page 3-24). Under the Selected Alternative, treatments (such as larch thinning and improvement harvests) are designed to maintain existing western white pine, larch and ponderosa pine ecosystem attributes.

***(5) The activities will provide for and maintain a diversity of plant and animal communities;***

***(6) Activities will either not affect or will maintain sufficient habitat for viable populations of existing native vertebrate species and management indicator species consistent with the multiple-use objectives established in the Forest Plan;***

**and**

***(8) Implementation of the Selected Alternative will not affect critical habitat for Threatened and Endangered species.***

The Coeur d'Alene River District Wildlife Biologist, Fisheries Biologist, and Botanist evaluated the Selected Alternative (modified Alternative 3) in regard to wildlife, fish and plant species. Findings are disclosed in the Environmental Assessment (Chapter 3) and summarized in the Biological Assessment and Evaluations (Project Files). The findings are also summarized briefly under Section 6.9, Endangered Species Act. The Selected Alternative will maintain a diversity of animal communities, as described below. The US Fish & Wildlife Service has reviewed our Biological Assessment for these Threatened and Endangered species, and has concurred with our determination of effects (Project Files, BE/BA). Further discussion of viability (by species) is provided in Attachment B.

***(7) Management prescriptions have been assessed prior to project implementation for potential physical, biological, aesthetic, cultural, engineering, and economic impacts of the Selected Alternative and are consistent with multiple uses planned for the area.*** These potential impacts have been assessed and are disclosed in the Environmental Assessment (Chapter 3 and Appendix A) with supporting information in the Project Files.

***(9) Provide that existing significant transportation and utility corridors and other significant right-of-ways that are capable and likely to be needed to accommodate the facility or use from an additional compatible right-of-way be designated as a right-of-way corridor.*** There are no right-of-way grants being issued as part of the activities.

***(10) Ensure that any roads constructed through contracts, permits or leases are designed according to standards appropriate to the planned uses, considering safety, cost of transportation, and effects upon lands and resources;***  
and

***(11) Provide that all roads are planned and designed to re-establish vegetative cover on the disturbed area within a reasonable period of time, not to exceed 10 years after the termination of a contract.***

There is no road construction associated with the Selected Alternative.

***(12) Applicable Federal, State, and local air quality standards will be met.*** The monitoring of air pollutants during prescribed burning seasons is used to eliminate burning during times when such activities would result in violations of the State Standards, including unacceptable impacts to non-attainment areas. The North Idaho/Montana Airshed Group monitors smoke management for air quality; the Forest Service voluntarily ceases burning operations to avoid violation of State standards. The Idaho Panhandle National Forests coordinate and schedule burning activities to maintain air quality. Burning plans addressing smoke management are prepared by qualified personnel. The Coeur d'Alene River Ranger District implements burning projects in Airshed #11. The monitoring of air pollutants during prescribed burning periods has not recorded any violations of the State standards to date. Because use of prescribed fire will be based on these smoke management guidelines, current air quality standards will not be exceeded (EA, page A-7). Over the long-term, prescribed fire may reduce total particulates by reducing the risk of large wildfires that cannot be managed for emissions. This project meets the Clean Air Act and state monitoring requirements through coordination with the State prior to burning, and the use of burning techniques that minimize smoke emissions (Project Files, Air Quality).

### **6.15.3 Vegetation Manipulation (36 CFR 219.27(b))**

***(1) Be best suited to the goals stated in the Forest Plan.*** After review of the expected environmental consequences of the various alternatives (EA, Chapter 3), I believe the Selected Alternative is well suited to initiate Forest Plan direction and meet the multiple-use goals established for the area. Please refer to the "Forest Plan Consistency" discussion in this decision document (Section 6.15.1).

***(2) Assure that technology and knowledge exists to adequately restock lands within five years after final harvest.*** Technology and knowledge does exist to comply with this requirement (EA, page 3-24, and IPNF Forest Plan Monitoring and Evaluation Report, 1998, page 7). Please refer to the "Forest Plan Consistency" discussion in this decision document (Section 6.15.1).

***(3) Not be chosen primarily because they will give the greatest dollar return or greatest output of timber (although these factors shall be considered).*** Economic factors were considered in my decision; however, the Selected Alternative was chosen primarily based on the benefits to the environment and responsiveness to Forest Plan goals. Finances are discussed in the EA, pages 3-35 through 3-40.

***(4) Be chosen after considering potential effects on residual trees and adjacent stands.*** The analysis considered the effects on residual trees and adjacent stands (Chapter 3 of the EA, Forest Vegetation discussions, pages 3-1 through 3-25). These effects were considered in my decision. I find the treatments that will occur under the Selected Alternative are designed to protect reserve trees and adjacent stands, including riparian areas, to the extent possible.

***(5) Be selected to avoid permanent impairment of site productivity and to ensure conservation of soil and water resources.*** The use of Best Management Practices (BMPs), avoidance of problem soil areas, regulation of yarding and site preparation operations, and the application of specific features of the Selected Alternative will assure that site productivity is maintained and soil and water resources are protected (DN, Sections 5.2, Features Designed to Protect Aquatic Resources; Section 5.5, Features Designed to Protect Soil Productivity; EA, pages 2-21 and 2-22; and the Project Files, "Soils.")

*Be selected to provide the desired effects on water quality and quantity, wildlife and fish habitat, regeneration of desired tree species, forage production, recreation uses, aesthetic values, and other resource yields.* After review of the Environmental Assessment, I find that the Selected Alternative will provide the desired effects on vegetation resources within the project areas, and will have acceptable effects on water, wildlife, and soil resources within the project areas. Please refer to the discussions of effects to resources in Chapter 3 of the Environmental Assessment, and the “Forest Plan Consistency” discussions in this decision document (Section 6.15.1).

**(6) Be practical in terms of transportation and harvesting requirements and total costs of preparation, logging and administration.** Data presented in the Environmental Assessment and Project Files relative to transportation, economics and harvesting requirements indicate to me that the Selected Alternative is feasible and practical. Please refer to the Financial discussions in the Environmental Assessment (pages 2-28, 2-29, and 3-35 through 3-40) and the Project Files.

#### **6.15.4 Silvicultural Practices (36 CFR 219.27(c))**

**No timber harvest, other than salvage sales or sales to protect other multiple-use values, shall occur on lands not suitable for timber production [16 U.S.C. 1604 (k)].**

Guidelines for determining suitability are found in the Forest Plan (EA, page 2-5). Harvest units are within productive habitat types as described in the Forest Plan (EA, page 3-24). Tree harvest will occur within Management Areas 1 and 6 as described in the Forest Plan (Forest Plan, Chapter III). Management Area 1 consists of lands designated for timber production. Management Area 6 consists of lands designated for timber production within elk summer range habitats.

#### **6.15.5 Even-aged Management (36 CFR 219.27(d))**

**When timber is to be harvested using an even-aged management system, a determination that the system is appropriate to meet the objectives and requirements of the Forest Plan must be made. Where clearcutting is to be used, it must be determined to be the optimum harvest method [16 U.S.C. 1604 (g)(3)(F)(i)].**

The Selected Alternative will employ the use of even-aged management systems (regeneration harvests) on 59 of the total 253 acres to be harvested. Regeneration harvests are proposed for most stands in which a large component of the overstory stand basal area has been lost to bark beetles (EA, page 3-16, 3-34). No clearcutting is planned.

The location, shape of openings, and retention of all healthy large overstory component on the site using group and irregular shelterwood harvest systems will achieve the desired combination of multiple-use objectives. The regeneration (group shelterwood) units range from 2 to 12 acres in size. The harvest systems will retain 20-30% of the overstory component on site. Shelterwood harvest prescriptions followed by planting will allow for the establishment of pines and larch on the site. I have reviewed the silvicultural information in the Environmental Assessment and Project Files and the site-specific management objectives within the Forest Plan and have determined that even-aged management practices are the appropriate method to achieve the multiple resource objectives on the sites selected for harvest.

## **7. Finding Of No Significant Impact**

The direct, indirect and cumulative effects of the project activities have been reviewed as documented in this Decision Notice, the Environmental Assessment, and the Project File. The setting of this proposal is in a localized area, with implications only for the landscape, drainages and stands in the analysis area. Consideration of the proposed action is based on its impact on the ecosystem, local communities, county, and at the affected resource level. It does not have any large or lasting affect on society as a whole, the nation, or the state.

Based on this review, it has been determined that there are no significant beneficial or adverse impacts on the physical, biological, or social portions of the human environment. The Selected Alternative is consistent with the management direction, standards, and guidelines outlined in the Forest Plan for the Idaho Panhandle National Forests.



**Significant impacts (both beneficial and adverse):** Effects associated with the Selected Alternative are discussed in Chapters 2 and 3 of the Environmental Assessment. The impacts are within the range of those identified in the Forest Plan. The actions would not have significant effects on other resources identified and described in the Environmental Assessment and Project Files. Activities will result in temporary and low-impact effects. Harvesting and log hauling activity will increase traffic on Forest Service Roads and on county roads that are the primary access roads into the area. Precautionary signing will provide safety in areas of activity. No significant increase in water yields or sedimentation in the analysis area streams is expected, and State water quality guidelines will be met. Implementation of Inland Native Fish Strategy standards and guidelines will protect stream courses from sedimentation (EA, Chapters 2 and 3). It is my determination that the Selected Alternative will have no significant effects on public health and safety or on resource attributes of the project area.

**Unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farms, wet lands, wild and scenic rivers, or ecologically critical areas:** The analysis area does not contain nor is it in the immediate proximity to such areas. The Selected Alternative will have no significant effect on unique resource characteristics.

**The degree to which the effects on the quality of the human environment are likely to be highly controversial:** The effects of these activities on the quality of the human environment are not highly controversial. Past monitoring has determined that actual effects of similar projects are consistent with estimated effects of the proposed activities. There is wide professional and scientific agreement on the scope and effects of these actions on the various resources.

**The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk:** The planned actions are similar to actions implemented in other areas on National Forest System, state, county, and private lands. Effects will be similar to those of past actions. The analysis considered the effects of past actions as a frame of reference in conjunction with scientifically accepted analytical techniques, available information, and best professional judgment to estimate effects of the proposal. It is my conclusion that there are no unique or unusual characteristics of the area which have not been previously encountered that would constitute an unknown risk upon the human environment.

**The degree to which the action may establish a precedent for future actions with significant effects or presents a decision in principle about future consideration:** The Selected Alternative is not setting a precedent for future actions with significant effects. Management practices are consistent with the Forest Plan and with the capabilities of the land. This action does not represent a decision in principle about a future consideration.

**Whether the action is related to other actions with individual insignificant but cumulative significant impacts:** The combined effects of past, other present, and reasonably foreseeable actions are discussed in the Environmental Assessment; there is no indication of significant adverse cumulative effects to the environment (EA, Chapters 2 and 3).

**The degree to which the action may adversely affect districts, sites, highway structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historic resources:** There are no features in the area that are listed or are being considered for listing on the National Register of Historic Places. All cultural resources would be protected (Decision Notice, Section 5.9; and EA, page 2-23). The potential for impacts to undiscovered sites is addressed by compliance with Forest Plan standards and guidelines, and through the use of standard timber sale contract clauses.

**The degree to which the action may adversely affect an Endangered or Threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973:** It was determined that the proposed action may affect some specific Threatened, Endangered or candidate wildlife, fish, or plant species individuals which may occur in the area, but would not likely trend toward federal listing or result in a loss of viability. Refer to Section 6.9 of this Decision Notice for additional discussion. A Biological Assessment has been completed and is part of the Project Files. U.S. Fish & Wildlife Service reviewed the assessment and concurred with its findings.

**Whether the proposed action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment:** The proposal meets federal, state and local laws for air and water quality, streamside management, riparian areas, cultural resources, and Threatened and Endangered species, and meets National Environmental Policy Act disclosure requirements as described in this Decision Notice and the Environmental Assessment.

## 8. Comparison To Other Alternatives Considered

As stated earlier, my decision is based on:

- *the extent to which each alternative addresses the purpose and need for action*
- *how well each alternative responds to environmental issues and concerns identified by the public, other agencies, and Forest Service resource specialists*
- *consistency with the goals and findings of Forest policy and legal mandates*
- *effects of the selected alternative in comparison to other alternatives considered*

### Alternative 1 (No-Action)

I did not select **Alternative 1** for implementation because it would not address the purpose and need for action (EA, page 2-11). There would be no recovery of the economic value of damaged timber (EA, pages 2-28, 2-29) and no improvement in the vegetative resources (EA, pages 3-15, 3-35, and 3-37 through 3-40). There would also be no reduction in the long-term fire hazard as a result of the timber harvest and a combination of fuels treatment methods. Alternative 1 would address concerns identified by those members of the public who do not want timber harvest to occur, but would not respond to the vegetation and fuels-related concerns.

Although Alternatives 2, 3 and 4 would all have accomplished the same harvest treatments and would have very similar effects, Alternative 3 will accomplish 72 acres of ecoburning, including understory removal activities. I did not select **Alternative 2** for implementation because it would not accomplish any of the ecoburning or understory removal activities in the Grizzly Mountain project area (EA, pages 2-11 and 2-12).

I did not select **Alternative 4** for implementation because there would be substantially fewer acres of ecoburning in the Grizzly Mountain project area than would occur under Alternative 3. The ecoburning under the Selected Alternative is important because it will provide logical, defensible burn boundaries for introducing prescribed fire into the mid-slope harvest units, and will reduce slash levels above the road. In combination with the understory removal, this will help to reduce potential fire intensities in this area (EA, page 3-32).

## 9. Public Involvement

Scoping is an early process for identifying the issues related to the proposed action, and the extent of those issues (EA, page A-1). The public was notified of this project in several ways:

- *a scoping letter (dated December 26, 2001) mailed to those who typically provide comment on our project and for those who requested additional information*
- *a legal ad published in the newspaper of record (Spokesman-Review) dated December 28, 2001*
- *notification in the "Quarterly Schedule of Proposed Actions" for the IPNFs (starting with the February 2002 issue to current issue)*

During scoping, letters were received from Bryan Bird, (Forest Conservation Council), Ryan Shaffer (Alliance for the Wild Rockies), and Mike Mihelich (Kootenai Environmental Alliance). Copies of their letters and Forest Service response to comments were provided in the Environmental Assessment (Appendix A, Project Files). The Environmental Assessment was distributed to the public for review and comments in June 2002. Comments based on review of the Environmental Assessment were received from Mike Mihelich (Kootenai Environmental Alliance) and Rein Attemann (on behalf of The Lands Council, Ecology Center, Upper Columbia River Group of the Sierra Club, and the Alliance for Wild Rockies). Copies of their letters and our response to comments are provided in Attachment B of this Decision Notice.

## 10. Documents And Project Files

This Decision Notice summarizes some of the analyses that have led to this point in the process. More reports and analyses documentation have been referenced or developed during the course of this project and are part of the Project Files. All project files for the Hither and Yon project are available for review by the public. Please contact the NEPA Coordinator at the Coeur d'Alene River Ranger District (Fernan Office), (208) 664-2318, to review the files.

## 11. Appeal Rights And Implementation

This decision is subject to appeal pursuant to 36 CFR 215. A written Notice of Appeal must be submitted within 45 days after the date of notice of this decision is published in the Spokesman-Review newspaper. The Notice of Appeal must be sent to the Appeal Deciding Officer (Regional Forester): **USDA Forest Service, Region 1, Attn: Appeals Deciding Officer (RFO), P.O. Box 7669, Missoula, MT 59807.**


It is the appellant's responsibility to provide sufficient written evidence and rationale to show why my decision should be remanded or reversed. An appeal submitted to the Appeal Deciding Officer becomes a part of the appeal record. An appeal must meet the content requirements of 36 CFR 215.14.

As a minimum, the Notice of Appeal must include:

- ✓ *a statement that your document is an appeal filed according to 36 CFR part 215*
- ✓ *your name, address and, if possible, telephone number*
- ✓ *the decision being appealed by title and subject, date of decision, and name and title of the Responsible Official*
- ✓ *the specific changes you want to see in the decision or the portion of the decision to which you object*
- ✓ *a statement of how my decision fails to consider comments previously provided either before or during the comment period specified in 36 CFR 215.6 and, if applicable, how you believe the decision violates law, regulation, or policy*

Your appeal will be dismissed if the preceding information is not included in the Notice of Appeal. If no appeal is received, implementation of this decision may occur five business days from the close of the 45-day appeal filing period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition.

I am the Responsible Official for this decision. For more information regarding the project, contact Project Team Leader Bob Rehnberg at the Fernan Office of the Coeur d'Alene River Ranger District, (208) 664-2318.

  
JOSEPH P. STRINGER  
District Ranger  
Coeur d'Alene River Ranger District

1/27/05  
Date

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## ATTACHMENT A "

### CORPORATE MONITORING INFORMATION"

#### Long-term Monitoring of Ecosystem Core Data "

The Idaho Panhandle National Forests are currently implementing a process to monitor changes to a number of ecosystem conditions resulting from project activities and natural disturbances. The overall focus of this monitoring is to evaluate changes in ecosystem condition (structure, composition, and function). The following ecosystem conditions (Core Data Monitoring Elements) have currently been selected for long-term monitoring: hydrologic integrity, wildlife security and public access, water yield, changes in forest structure outside the Historic Range of Variability (HRV), changes in species composition outside HRV, habitat loss and species decline, and changes in landscape pattern. The analysis for each project considers project-related changes to these conditions and anticipated changes are described in project environmental analysis documentation. Table A-1 displays the anticipated project related changes to these conditions and the core data to be monitored.

**Table A-1. Anticipated project related changes to ecosystem conditions. "**

Condition	Core Data	" Project-related changes "
Hydrologic integrity	Road density	Under the Selected Alternative, there is no change in road densities. There is no proposed road construction, either temporary or system. There is no road removal identified as a feature of the Selected Alternative.
Wildlife security and public access	Open road density	In the Grassy Mountain Project Area, the gate on Road 1564 will be opened for sale activities, but will be closed at the end of each day's activities and on weekends. Approximately one-tenth of a mile of system road in the Grizzly Mountain Project Area will be brought out of storage to access a suitable helicopter landing. The road will be put back in storage after completion of activities.
Water yield	Hydrologic openings (equivalent clearcut acres, or ECA's)	Mortality caused by bark beetles, root disease, and blister rust has created the openings. Canopy reduction associated with the harvest of smaller or unhealthy green trees is a minor component. The selected alternative will result in a total increase of 12 scattered equivalent clearcut acres over what would occur under the No-Action Alternative (2 ECA's in the Grassy project area, 4 ECA's in Grizzly, and 6 ECA's in Dobson Pass).
Changes in forest structure outside HRV	Forest structure by size and age class groups	Loss of forest structure under this proposal is very similar to that caused by the bark beetle outbreak and losses to root disease and other causal agents over time. The Selected Alternative will move 59 acres that were in the large sawtimber group and 2 acres that were in small/medium sawtimber group (a total of 61 acres) back to the seeding/sapling phase. This change is the same as would occur under the No-Action Alternative naturally due to losses to bark beetles and root disease mortality. Since bark beetles and root disease are a naturally occurring phenomenon, this proposal stays within the range of historic variability.
Changes in species composition outside HRV	Forest composition by forest cover type group	Implementation of the selected alternative will actually hasten the return to the historic range of variability beyond what would occur under the No-Action Alternative by returning pines and larch into the ecosystem in areas of high mortality as opposed to letting the areas regenerate back to fir and by maintaining western larch and ponderosa pine in thinning and improvement harvest areas. There will be a 72-acre increase in white pine, larch and ponderosa pine, which will trend toward more historic conditions.
Habitat loss and species decline	TES dry and moist/cold site habitat restoration	This project will provide improvement harvests to maintain dry habitat type conditions. No moist/cold habitat types will be treated under the Selected Alternative.
Changes in landscape pattern	Landscape pattern indicators (mean patch size and variability, edge density etc.)	Changes in the landscape pattern created by the proposal follows the landscape pattern of mortality that naturally occurred as a result of a bark beetle outbreak and root disease. Regeneration harvest units will leave patches of healthy large trees retaining 20-30% of the overstory canopy on the site. This should result in a natural appearance on the hillside.

## ATTACHMENT B "

### SPECIES VIABILITY "

"

#### Introduction "

"

The National Forest Management Act direct that “habitat must be provided to support at least a minimum number of reproductive individuals, and that habitat must be well distributed so that those individuals can interact with others in the planning area.” The planning area is defined as the Forest Service lands included in the long-range management (Forest) plan.

"

#### Threatened or Endangered Wildlife Species "

The following table summarizes the potential effect of project activities on habitat of Threatened or Endangered wildlife species, followed by a more detailed synopsis of habitat conditions and possible effects. Documentation of the analyses of effects to these species is provided in the Environmental Assessment (Chapter 3 and Appendix A) and in the Project Files (Wildlife).

**Table B-1. Summary of potential effects to Threatened & Endangered wildlife species. "**

Species "	Summary of Potential Effect "
grizzly bear	No effect, no loss of viability
bald eagle	No effect, no loss of viability
Canada lynx	In the Grassy Mountain and Grizzly Mountain areas, activities may affect individuals but will not likely adversely affect populations. In the Dobson Pass area, there will be no effect. There will be no loss of viability to the species as a result of project activities.
gray wolves	May affect individuals, but will not likely adversely affect populations; no loss of viability.

The **grizzly bear**'population on the IPNF as a whole is estimated to be stable to increasing slightly (2001 Forest Plan Monitoring Report, page 2). Grizzly bears are occasionally sighted in the Coeur d'Alene River Basin. The last sightings were in 1995, both on the northern edge of the District (Project Files, BE/BA, Biological Assessment, p. 19). No high quality grizzly habitat has been identified on the District. Potential habitat is unoccupied; and the area lacks survival and recovery values for the species. The Coeur d'Alene River Ranger District is not within a recovery zone for the bear. In the Hither and Yon project area, activities will result in minor changes to stands over a small area, with disturbances of short duration (Project Files, BE/BA, Biological Assessment, p. 19). This project will not add to the overall fragmentation of the basin, will not increase access, and will not affect the prey base for this species. The project will not contribute to the cumulative effects of ongoing or reasonably foreseeable activities on public or private lands. Based on these considerations, there will be no effect to grizzly bears as a result of implementing activities under this project.

In Idaho, the **bald eagle**'nesting population continues to increase from 12 known nesting territories in 1980 to 113 occupied nesting territories in 2000 (Idaho Fish & Game website). Monitoring bald eagle populations is a cooperative effort by the Forest Service, Idaho Department of Fish and Game, U.S. Fish and Wildlife Service, Bureau of Land Management, U.S. Army Corps of Engineers and Idaho Department of Lands (1998 Forest Plan Monitoring Report, p. 28). Over the past several years, bald eagle populations have steadily increased in Zone 7, in which the IPNF is located. In 1994, the bald eagle was downlisted from endangered to threatened status, and on July 6, 1999, US Fish and Wildlife proposed the species for delisting based on its recovery. Activities under the Hither and Yon project will not affect potential bald eagle habitat. The nearest unit, helispot, or service landing is approximately 3 miles from any suitable nesting site in the Coeur d'Alene River corridor area. Based on these considerations, there will be no effect to bald eagles as a result of implementing activities under this project. Bald eagle populations at the Forest and State levels indicate that activities are consistent with recovery of the species and with maintaining habitat for viable populations.

As required by the **Canada Lynx** Conservation Assessment and Strategy or LCAS (USDA Forest Service, 2000), lynx analysis units (LAU's) have been identified for management of lynx (EA, page A-3; Project Files, BA/BE's). Six LAU's and two Lynx Travel Corridors have been established on the Coeur d'Alene River Ranger District for the management and further protection of lynx populations. No activities will occur within LAU's or travel corridors under

the Hither & Yon project. The Grizzly Ridge LAU is located east and north of the Grassy Mountain and Grizzly Mountain project areas, respectively. Unit 8 in the Grassy Mountain project area was dropped from consideration to avoid activities immediately adjacent to the LAU and to protect denning habitat. None of the other harvest units are located within or immediately adjacent to any LAU or Lynx Travel Corridors. Activities in the Grassy Mountain and Grizzly Mountain project areas, though small in scope, may affect individual lynx due to the proximity to habitat conservation areas, but would not likely adversely affect populations. Activities in the Dobson Pass area would have no effect on lynx or their habitat (EA, page A-3; and Project Files, BA/BE's). The actions in the analysis area are fully compatible with recovering lynx to non-listed status and consistent with maintaining habitat for viable populations of lynx at the Regional scale.

**Gray wolves** are rapidly re-colonizing in Montana and Idaho. The recovery goal for wolves in the Tri-State area (Montana, Idaho and Wyoming) is 30 packs (USDI 1987). That goal has been exceeded – at the end of 2001, an estimated 570 wolves in 34 or more breeding wolf packs inhabited the Tri-State recovery areas. Current distribution of gray wolves in Idaho includes the central and northern parts of the state near the Frank Church Wilderness and adjacent to Canada and Montana (EA, page A-2; and Project Files, BA/BE's, page 17). No known wolf packs or den sites exist in the Coeur d'Alene River Basin, but observations of individuals and pairs have occurred sporadically over time. There have been three sightings of gray wolf in the Grizzly Mountain and Steamboat areas. These sightings seem to indicate transient individuals or lone wolves. There are no recorded sightings in the Dobson Pass area. The project area and vicinity supports prey species for wolves (such as elk, deer and small mammals). Although implementation of the Selected Alternative will cause some disturbance associated with harvest and ecoburning, the scope of the project is small and of short duration; therefore activities may affect individual gray wolves, but would not likely adversely affect their populations. Wolf pack numbers at the Forest, Northern Idaho-Western Montana, and Tri-State area clearly indicate that cumulative, broad-scale activities are consistent with recovery at all scales.

## **Sensitive Wildlife Species "**

The following table summarizes the potential effect of project activities on habitat of Sensitive wildlife species, followed by a more detailed synopsis of habitat conditions and possible effects. Only those species that may be affected by project activities are discussed in further detail. No discussion is provided for those species that will not be impacted at the project area scale, since there would be no increase or decrease in effects to this species at any larger scale (such as the Forest or Basin) as a result of this project. Documentation of the analyses of effects to these species is provided in the Environmental Assessment (Chapter 3 and Appendix A) and in the Project Files (BE/BA, Wildlife).

**Table B-2. Summary of potential effects to Sensitive wildlife species. "**

<b>Species "</b>	<b>Summary of Potential Effect "</b>
Townsend's big-eared bat	No impact, no loss of viability.
harlequin duck	No impact, no loss of viability.
peregrine falcon	No impact, no loss of viability.
common loon	No impact, no loss of viability.
boreal owl	No impact, no loss of viability.
Coeur d'Alene salamander	No impact, no loss of viability.
boreal toad	No impact, no loss of viability.
northern leopard frog	No impact, no loss of viability.
wolverine	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.
northern goshawk	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.
black-backed woodpecker	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.
fisher	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.
American marten	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.
flamulated owl	May impact individuals or habitat, but will not likely trend toward federal listing or reduced viability for the population or species.



The Hither and Yon project areas do not provide habitat for Townsend's big-eared bat, harlequin ducks, peregrine falcons, common loons, or boreal owls which is why there will be no effect to these species as a result of project activities (Project Files, BE/BA, Biological Evaluation for Sensitive Wildlife Species; EA, Appendix A, pages A-3 through A-5). Buffers required under the Inland Native Fish Strategy will assure that habitat for the Coeur d'Alene salamander, boreal toad, and northern leopard frog will not be impacted.

Project activities (timber harvest) may impact individual wolverine, northern goshawk, black-backed woodpeckers, fishers, American marten, and flammulated owls (or their habitat) as a result of loss of snags and dead trees and short-term disturbance, but will not likely result in a trend toward federal listing or reduced viability.

**Wolverine:** Habitat does not appear to be limiting for wolverines on the IPNF. Increasing snowmobile use and backcountry winter recreation is likely the greatest threat (limiting factor) to wolverines. Since actual den locations are not known, it is difficult to protect these habitats from recreational disturbance. Recorded wolverine occurrences in the Coeur d'Alene River drainage are likely transient individuals, based on the lack of existing habitat components (both denning habitat and large sparsely inhabited wilderness areas) in the area. There is no wolverine denning habitat within or adjacent to the activity areas of the Hither and Yon Beetle project. Relatively high road densities in the Coeur d'Alene River drainage (both on National Forest and other ownership) limit the drainage's suitability as wolverine habitat. The project will result in a minor change in open road densities and some potential disturbance associated with harvest and prescribed fire treatments. Therefore, the Selected Alternative will not likely contribute to a trend toward federal listing or cause the loss of viability to the population or the species (EA, page A-5, Project Files - BE/BA).

**Northern Goshawk:** "In the 1980's, there were two recorded sightings of northern goshawk within the Grizzly Creek and Steamboat Creek drainages. In 1998, the US Fish & Wildlife Service identified northern Idaho as part of its "Assessment Area 1," and reported, "Goshawks are widely distributed across the forested habitat in this Assessment Area." They determined that "It is reasonable to conclude that the goshawk population has declined in the Assessment Area when looking at habitat changes since pre-settlement times. However, goshawks appear to remain widely distributed throughout this area, and there are no data to indicate any extirpation or current, ongoing decline," ("Northern Goshawk Finding," USDI Fish & Wildlife Service, 1998).

There are two limiting factors for goshawks: the amount of mature and old growth stands in large enough patches to provide nesting habitat, and open understory structure in otherwise suitable habitats. Forest Plan standards require that 231,000 acres of old growth (10% of forested acres) be maintained on the IPNF. Currently, 267,840 acres (11.6% of forested acres) are retained as old growth across the Forest (2001 Forest Plan Monitoring Report, pages 3, 59, 60). An additional 8,269 acres (0.4% of forested acres) are field verified unallocated old growth.

Little potential goshawk habitat exists in either the Grizzly Mountain or Dobson Pass project areas, since there are no stands allocated to old growth management within the two areas. There are approximately 180 acres of allocated old growth in the Grassy Mountain project area. There will be no effect to allocated old growth, and no change in mature forest structure as a result of activities under the Hither and Yon project (EA, pages 3-20 and 3-21). Project activities will have no impact on goshawk habitat in the Grassy Mountain area based on the small scale and duration of the project, surveys of suitable habitat prior to implementation of activities, and the implementation of mitigation measures to protect habitat. No goshawk home range is expected to become unsuitable as a result of implementing the Selected Alternative; therefore, species viability should not be affected by the project activities.

**Black-backed Woodpeckers:** This species is widespread, but occurs in very low numbers except in areas that have been burned in the last three years (IPNF FP Monitoring Report, 1998, page 59). On the IPNF, black-backed woodpecker populations are likely lower than they were historically because there have been few large fires in recent years. In the last ten years, only 8 fires in the area were 10 acres or larger; only 1 was over 80 acres. Over 500 other fires averaged less than 2 acres each. However, the Douglas-fir beetle outbreak has increased the snag component over what existed prior to the outbreak. Aerial detection flights in 1998 showed 2,730 acres on the Coeur d'Alene River District affected by beetle mortality, with 63,100 acres affected in 1999 and 62,800 acres affected in 2000. Over 50 incidental sightings of black-backed woodpeckers have been documented on the Forest since 1992 (1998 Forest Plan Monitoring Report, 1998, page 59). Past surveys on the Coeur d'Alene District have located 16 of these species or their sign. Project activities have been designed to protect habitat for this species. For example, any trees bole-scorched during site preparation burning operations will be retained on site for black-backed woodpecker habitat (Section 5.6 Features Designed to Protect Wildlife Habitat). While the activities may impact individual black-backed woodpeckers

or their habitat as a result of loss of snags and dead trees, they will not likely result in a trend toward federal listing or reduced viability for the population or species (Project Files, BE/BA).

**Fisher:** Idaho's population of fishers has been slowly increasing since the 1960's, when it was re-introduced to three north-central Idaho sites. Since then, fisher sightings have been documented throughout many of the forested portions of the state. The Conservation Data Center has 80 records of fishers in the Idaho Panhandle prior to 1988. Trappers interviewed by the Forest Service in 1998 noted 5 other sites on the IPNF where fishers had been seen prior to 1988. Since 1988, fourteen fisher sightings have been reported on the Priest Lake District. In 1997, a valid report of a female fisher and young were documented in the Kalispell Creek drainage. Other reports were received in the surrounding area, suggesting the same individual. (1998 IPNF Forest Plan Monitoring Report, pages 61-62)

There are no recorded sightings of fishers within or adjacent to the project areas. However, fishers may be present occasionally and are infrequently present in adjacent suitable habitat. Little potential fisher habitat exists within the Grizzly and Dobson Pass project areas (EA, page 3-86). Past harvest in the Grassy Mountain area resulted in a loss of some suitable fisher habitat. However, there are several large (300 or more acres) contiguous blocks of suitable fisher habitat along the main divide ridge on the eastern boundary. Limited opening of Road 1564 would create some disturbance, but the road does not bisect any suitable fisher habitat areas. Opening the road to preferred fuelwood gathering for one season would likely have only minor effects on fishers in the area. Based on the fact that disturbance associated with project activities could displace fishers over the short term (since fisher habitat does occur within the project area and some down and future large wood recruitment will be removed), the Selected Alternative may impact individuals or habitat but would not likely contribute to a trend toward federal listing (EA, page 3-86 and Project Files, BA/BE).

**Flammulated Owls:** "No population numbers exist for this species' historic condition. However, the Geographic Assessment for the Coeur d'Alene River basin determined that historic amounts of dry site large, mature and old-growth ponderosa pine and Douglas-fir were much more numerous than today (EA, page A-3). Approximately 95% of the suitable flammulated owl habitat has been reduced within the Lower Clark Fork Ecological Unit, in which the Coeur d'Alene River basin is located. Much of the habitat loss is due to urban and agricultural development on low-elevation private lands outside the forest boundary. There is no suitable flammulated owl habitat within the project areas. All treatment sites proposed under this project are outside of modeled capable flammulated owl habitat (Project Files, Wildlife). Flammulated owl habitat may be impacted by project activities as a result of a loss of snags and dead trees, which may affect individuals but will not likely trend the species toward federal listing, therefore there will be no loss of viability (Project Files, BE/BA).

## **Other Wildlife Species"**

The Selected Alternative is consistent with the January 10, 2001 Executive Order describing the Responsibilities of Federal Agencies to Protect Migratory Birds. The analysis of effects to wildlife evaluated effects of proposed activities on neotropical landbirds (migratory birds), as disclosed in the EA (pages 3-91, A-5, A-6). As more information and direction related to this Executive Order becomes available, the analysis and documentation related to the Hither and Yon Environmental Assessment project will be reviewed to determine whether a correction, supplement, or revision to the document is necessary, in compliance with Forest Service Handbook 1909.15 (Chapter 18).

**American marten** are an indicator of old growth forest communities with an abundance of down, woody materials. They are in the same guild as fishers (discussed above), so any changes in fisher habitat are the same for marten. Since disturbance associated with project activities could displace fishers (and therefore marten) over the short term, the Selected Alternative may impact individual marten or their habitat but would not likely contribute to a trend toward federal listing or a loss of viability (EA, page A-5).

**Pileated woodpeckers** are another old-growth management indicator species, found throughout the IPNF. Design features will assure that snags for pileated woodpeckers are maintained in harvest units (EA, Chapter 2, "Features Designed to Protect Wildlife Habitat and page A-5; and DN, Section 5.6 Features Designed to Protect Wildlife Habitat). The project is designed to maintain at least the minimum number of snags needed to support woodpecker populations distributed uniformly across the landscape (EA, Chapter 3, Wildlife – Snags and Dead Down Woody Habitat). Snag retention within treatment units will be of the largest diameter classes, preferred by pileated woodpeckers. Furthermore, there are many areas of bark beetle mortality outside of treatment areas that will provide snag habitat. Due to the snag

retention requirements and based on the small scope of this project, there will be no loss of viability to this species as a result of implementing the Selected Alternative.

**Elk** are used as a management indicator species for big game on the St. Joe and Coeur d'Alene River Ranger Districts of the IPNF. Idaho Fish and Game recommends a minimum elk habitat potential value of 50% for general summer range. The Forest Plan goal for elk habitat potential on the Wallace portion (east side) of the Coeur d'Alene River District is 52% or higher. Existing habitat potential is currently calculated to be 52% (IPNF 2001, page 63). At the Forest scale, monitoring shows Forest goals for elk habitat potential are also being met (IPNF 2001, page 63). Recent surveys of elk in the Panhandle Zone by IDFG found 6,668 and 5,561 elk respectively (IPNF 1998, page 33). Elk are now present in greater numbers than historically, partially due to re-introduction efforts in the early 1900's (EA, p. 3-89). On the St. Joe Ranger District, elk habitat potential did not change from 2000 to 2001 (2001 Forest Plan Monitoring Report, page 63). On the Coeur d'Alene River Ranger District, elk habitat potential decreased slightly but still meets the Forest Plan standards. The Hither and Yon project areas are located in Elk Habitat Units (EHU's) 3, 4, 5 and 7. The Forest Plan goal for elk habitat potential in EHU 3 is 72 percent; the current level is 76 percent. This would drop to 74 percent during project activities, then return to 76 percent following completion of activities. The Forest Plan goal for elk habitat potential in EHU 4 is 35 percent; the current level is 31 percent. The only activity in this EHU is the removal of "bumper" trees along Road 260; there will be no change in elk habitat potential in EHU 4. The Forest Plan goal for elk habitat potential in EHU 5 is 55 percent; the current level is 48 percent. There will be no change in road use within the project area, and activities will not change elk habitat potential in EHU 5. The Forest Plan goal for elk habitat potential in EHU 7 is 33 percent; the current level is 55 percent. There will be no change to this level in EHU 7 during or following completion of project activities (EA, pages 3-89, 3-90). Based on these factors, there will be no loss of viability to elk as a result of this project.

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## **ATTACHMENT C "** **RESPONSE TO PUBLIC COMMENTS "**

**"**

### **Introduction "**

**"**

The 30-day public review of the Hither and Yon Environmental Assessment began in June 2002. Comments were received from Mike Mihelich (Kootenai Environmental Alliance) and Rein Attemann (on behalf of The Lands Council, Ecology Center, Upper Columbia River Group of the Sierra Club, and the Alliance for Wild Rockies). A synopsis of their concerns, with our response, is provided below. A copy of each letter in its entirety is provided at the end of this Attachment.

### **Comments received from Mike Mihelich (Kootenai Environmental Alliance) "**

Mr. Mihelich also provided comments during scoping (EA, pages A-16, A-17). In his comments on the Environmental Assessment, Mr. Mihelich identifies several pieces of information that he believes "needs" to be or "must be" disclosed in the Decision Notice. The Decision Notice discloses all information required for an informed decision to be made. Other additional relevant information is more appropriately disclosed in the Environmental Assessment, as noted below. Some of the information requested may be of interest to Mr. Mihelich, but was not related to any key issue and is not relevant to the decision being made, also noted in the responses below.

**A-1. 'The DN needs to indicate whether the unroaded area mentioned on page 3-43 is in fact the Roadless Area " 01133. If the unroaded area is Roadless Area 01133, the DN should describe the distance in miles the " nearest proposed logging unit is from the Roadless Area. If the unroaded area is not Roadless Area 01133, " the DN needs to indicate the size in acres of the unroaded area described on page 3-43. The DN should " also supply information that will indicate whether any portion of the Roadless Area 01133 or the 34,700-" acre Magee Roadless Area (01132) is within the Grassy Mountain cumulative effects analysis area. "**

**"**

Mr. Mihelich did not comment on roadless or unroaded areas in his scoping comments (EA, pages A-16 and A-17). There are no lands in or adjacent to the Hither and Yon Project Areas that are identified as inventoried roadless (EA, page 2-3). In referring to the Tepee Creek watershed, the statement on page 3-42 simply states, "Much of the lower (northern half) is unroaded." The term "unroaded" is not the same as inventoried roadless. If this unroaded area were part of an inventoried roadless area, it would have been identified as such in the Environmental Assessment. Unroaded areas were not identified as an issue to be considered in this analysis (EA, page 2-6). In reference to the Hither and Yon Project Areas, the following statement is made: "Under the Recreation Opportunity Spectrum (ROS), the affected areas are classified as roaded and modified in appearance," (EA, page A-10). There are no lands identified as inventoried roadless within the Grassy Mountain, Grizzly Mountain, or Dobson Pass project or effects analysis areas. All harvest activity in the Grassy Mountain project area is adjacent to existing roads; no new roading is planned for the area under the Selected Alternative.

**"**

**A-2. The DN should describe the size in acres of the Teratoid Tepee analysis area and the potential amount of " acres that would be proposed for logging as a result of the EIS. "**

**"**

The Teratoid Tepee proposal is identified as reasonably foreseeable (EA, page 2-9). "These proposals are in the early stages, and there is little specific information available regarding the amount, location, and type of treatment activities. Effects of these projects will be analyzed under separate NEPA documentation once proposed treatment activities are identified, and will consider the cumulative effects of other past, ongoing (including the Hither and Yon Beetle project activities) and reasonably foreseeable activities at that time," (EA, page 2-9).

**"**

**A-3. The DN needs to supply expert agency comments that confirm the Forest Service prior to the late 1970's " did not recognize root disease problems that are associated with Douglas-fir trees. The DN also needs to " supply high quality information that would confirm "most areas" on the District have been planted with " WP, WL and/or PP since the late 1970's. "**

**"**

Mr. Mihelich has raised this concern in the past. As stated in response to his earlier comments, “Armillaria root disease has been known to occur in these forest types for many decades, but received minimal attention until the mid-1970’s, largely because the overall impact was not realized (USDA Forest Service, 1991, Forest Service Handbook #691). Considerable research regarding root disease occurred during the 1980’s and is continuing today,” (Little Ucelly Heli Bug Decision Notice, USDA Forest Service, January 2002, page B-3).

”

- A-4. The DN needs to supply high quality information that will indicate whether there exists a written " description of the methodology and equipment that are used to gather data regarding natural in-channel " and stream-bank erosion as they concern WATSED. The DN also needs to supply high quality " information that will indicate whether there are a minimum number of r-o-s events that are needed to " occur over a 20-year period in order to accurately build base information in the model for r-o-s events. "**

”

In his scoping comments, Mr. Mihelich identified information he felt needed included in the Environmental Assessment, but did not specify the information requested here (EA, page A-17). The methodology (including WATSED and “Sensitive Snowpack” characteristics) used to analyze existing aquatic conditions and the effects of proposed activities on aquatic resources is described in the Environmental Assessment (EA, pages 3-40 through 3-42; 3-49 through 3-51; and 3-60 through 3-63). In addition, the WATSED Project File Reports include guidelines for interpreting WATSED results (Project Files, Watershed).

- A-5. The DN should indicate whether field surveys in each analysis area indicated that openings caused by root " disease are in fact “common” in each analysis area. "**

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In his scoping comments, Mr. Mihelich did not identify this information as being of concern. The methodology used to identify existing vegetative conditions and assess effects of the proposed alternatives on vegetation is provided in the Environmental Assessment (pages 3-2 and 3-3). Root disease is also discussed under “Disturbance and Successional Patterns” on page 3-7; “Current Situation in the Coeur d’Alene Basin” on pages 3-7 through 3-9; and “Current Situation in the Project Areas” on pages 3-9 and 3-10.

- A-6. The DN or the project files should supply high quality information contained in the Forest Plan and " previous memos from the IPNF Forest Supervisor’s that indicate allocated old growth stands must contain " significant components of white pine and larch. "**

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In his scoping comments, Mr. Mihelich did not identify this information as being of concern. There is no statement in the Environmental Assessment that “allocated old growth stands must contain significant components of white pine and larch.” The importance of the white pine and larch components in some timber stands is described in the “Forest Vegetation” portion of the Environmental Assessment. The Renewable Resources Planning Act (RPA) of 1974 states, “It is the policy of Congress that all forested lands in the National Forest System be maintained in appropriate forest cover with species of trees, degree of stocking, rate of growth and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans,” (EA, page 3-1). Also, “Plans will be developed which specify guidelines to...provide for the diversity of plant and animal communities based on the suitability and capability of land areas to meet multiple-use objectives; [and] where appropriate, to the degree practicable, preserve the diversity of tree species similar to that existing in the planning area...” (EA, page 3-1). Douglas-fir, grand fir and western hemlock were, historically, the dominant cover types on about 30% of the Coeur d’Alene Basin. Currently, fir and hemlock cover types are dominant on about 82% of the Basin. Shade-tolerant species such as grand fir, Douglas-fir and western hemlock are more susceptible to root diseases than early seral species like larch and white pine (EA, page 3-8). Reforestation with pine and larch will restore areas to more historic stand conditions (EA, page 3-24). Improvement and thinning treatments will help maintain existing pine and larch stands over the long term.

- A-7. The DN needs to supply high quality information and accurate scientific analysis, NEPA at 40 CFR " 1500.1(b), that has been acquired after 1996 that show the functioning at risk (FAR) status for the Upper " Tepee Creek watershed continues to be an accurate description of the watershed. The DN also needs to " supply high quality information and accurate scientific analysis that confirms there would be “no additive " cumulative effects”, page 2-29 of EA, to fisheries and fisheries habitat in the Grassy Mountain analysis " area from the proposed logging and the past logging activities, including the Big Short Salvage timber sale. "**

”

The “Apparent Watershed Status” (properly functioning, functioning at risk, or not properly functioning) is discussed in the EA (page 3-41) and identified for each project area watershed (pages 3-45, 3-47, and 3-49). These categories were used to describe current conditions in the watershed (page 3-41). Additional discussion of methodology is provided in the Environmental Assessment, including information used to describe the current condition and anticipated effects (EA, pages 3-40 through 3-42; 3-49 through 3-51; and 3-60 through 3-63).

The information provided on page 2-29 of the Environmental Assessment is simply a summary comparison of effects (EA, page 2-26), and applies to all three project areas, not just Grassy Mountain. More detailed discussion of cumulative effects is provided in Chapter 3, Water Resources. The cumulative effects analysis area for the Grassy Mountain Project Area is Tepee Creek above Trail Creek; for the Grizzly Mountain Project Area it is the Grizzly Creek Watershed; and for the Dobson Pass Project Area it is the Beaver Creek Watershed. Cumulative effects are described on pages 3-50 through 3-59 of the Environmental Assessment. The effects of activities under the Big Short Salvage timber sale (including both harvest and watershed restoration activities) as well as other ongoing or reasonably foreseeable activities were considered in the analysis and are disclosed in the cumulative effects discussions. A list of ongoing and reasonably foreseeable activities is provided in the Environmental Assessment (pages 2-7 through 2-9), with watershed restoration activities already accomplished in the project areas identified on pages 3-42 and 3-43, as well as in the specific watershed discussions. “For the cumulative effects analysis for this project, watershed analysis was completed using WATSED modeling of changes and treatments being proposed. Past timber sale and roading activities were included in the analysis,” (EA, page 3-51). The WATSED modeling took into account the effect of harvest and watershed restoration activities occurring under the Big Short project. Validation checks of the WATSED model have occurred as part of Forest Plan monitoring, and indicate that the WATSED responses were accurate for flow response, but appear to over-estimate sediment loads (2000 Forest Plan Monitoring Report, page 3; 1999 Forest Plan Monitoring Report, page 3).

”

- A-8. The DN should indicate whether monitoring reports associated with the Big Short Salvage timber sale, including sale administrator reports and watershed/fisheries reports are included as part of the Hither and Yon project files. If these reports are not included in the project files, the DN should indicate whether the monitoring reports are located in the Big Short timber sale files. ”**

”

Timber sales are monitored throughout the life of the sale through timber sale administration to ensure implementation is consistent with project design (EA, page A-18). Post harvest reviews are conducted on a sampling of the sales to monitor if desired end results were achieved. Forest level monitoring of watershed effects in relation to analysis models such as WATSED are published in the annual Forest Plan monitoring report. Specialists did not specifically reference written evaluations of the Big Short salvage sale. Any documentation of evaluation or monitoring associated with the Big Short salvage sale are contained in the files for that sale.

”

- A-9. The DN should include information regarding the number of acres of standing dead wood and down dead wood that would be destroyed with the proposed logging in each analysis area. ”**

”

As stated by Forest Service Chief Dale Bosworth (McClure Lecture, University of Idaho, September 18, 2002), “The number and size of the trees we remove doesn’t matter. What matters is the number, size, and type of trees we leave on the land to achieve healthy landscape conditions.” The activities under the Selected Alternative will create a healthier long-term forest condition. The wood that is removed from the harvest units is utilized, not destroyed – it will either be sold as forest products (contributing to the economy), or will be used as “fish wood” (wood used in stream stabilization or fish habitat improvement).

Under the Selected Alternative, a combination of harvest treatments will be used (please refer to Table 1). Individual tree selection harvest treatments will salvage trees killed by bark beetles (including trees that have crown symptoms indicating the trees will die) and associated trees fading to root disease or other pathogens, leaving all other healthy trees on sites (generally, greater than 50% of the existing canopy component). The salvage units will not change the forest structure classes (EA, page 3-16).

In the regeneration (group shelterwood) units, healthy Douglas-fir over 16 inches in diameter and grand fir over 18 inches in diameter will be retained on site. Groups of trees and/or scattered individual trees that have been unaffected by the bark beetle infestation, root disease, or other pathogens will be retained in the harvest units.

Generally, 20 to 30% of the live stand basal area will be retained (EA, page 3-16). The effect of these regeneration units will generally result in no change to the forest structure classes in the short term, since the bark beetles, since and snow damage, and root disease have already done that. Over the long term, forest structure is more likely to change with the introduction of pines and larch, since these species are less susceptible to root diseases (EA, page 3-16).

Improvement harvests are intended to improve the health and vigor of ponderosa pine and to restore a more open stand structure associated with historic disturbance regimes (EA, page 3-17). Shade tolerant species (primarily Douglas-fir and grand fir) less than 16 inches in diameter within 25 feet of ponderosa pine and western larch will be harvested, leaving those trees larger than 16 inches diameter. The objective of the commercial thinning units is to improve the health and vigor of western larch in those units (EA, page 3-17). As in the improvement harvest units, shade tolerant species (primarily Douglas-fir and grand fir) less than 16 inches in diameter within 25 feet of ponderosa pine and western larch will be harvested, leaving those trees larger than 16 inches diameter. Approximately two-thirds of the existing basal area will remain following harvest. The improvement and commercial thinning units will not alter forest structure classes.

In the ecoburning treatment areas, smaller merchantable trees that are not expected to survive the ecoburn will be removed (generally trees less than 12 inches in diameter, depending on the species). The older, large, dead beetle mortality will be retained for wildlife habitat (EA, page 3-18).

Patches of beetle-killed timber have been excluded from harvest consideration both within and adjacent to the project areas. Live leave trees in regeneration areas would be reserved from harvest to provide size class diversity and long-term snag recruitment. Snags will be retained in accordance with the Northern Region Snag Protocol, which calls for greater snag retention than identified under Forest Plan standards (DN, Section 5.6, "Features Designed to Protect Wildlife; and EA, page 2-22). Some small patches of beetle-killed trees will also be retained for wildlife habitat or for woody debris recruitment in Riparian Habitat Conservation Areas (EA, page 3-16).

### **Comments received from Rein Attemann (The Lands Council, Ecology Center, Upper " Columbia River Group of the Sierra Club, Alliance for Wild Rockies) "**

Mr. Attemann did not provide comments (on behalf of any organization or himself) during scoping. No scoping comments were received from The Lands Council, Ecology Center, or the Upper Columbia River Group of the Sierra Club. Ryan Shaffer provided scoping comments on behalf of the Alliance for the Wild Rockies(EA, Appendix A).

**B-1. We...incorporate the Ecology Center's January 25, 2000 letter to the Forest Supervisor, which the Coeur " d'Alene River District Ranger received a copy, within these comments. We incorporate all of Plaintiff's " briefs, declarations, and other supporting documentation on the Douglas-fir Beetle Project (Lands Council " et al, v. Vaught) as comments on the Hither and Yon EA. The IPNF has a copy and knows the relevance of " each of the issues, facts, and arguments contained therein to this proposed timber sale. "**

..

Representatives of The Lands Council and Ecology Center have made this request in connection with numerous other projects (for example, in commenting on the Iron Honey DEIS and FEIS and in their appeal of the Iron Honey ROD; and in their comments on the Missouri Heli Bug EA). The Forest Supervisor has consistently responded that such an approach to public comment is insufficient and does not meet the requirements for commenting on Forest Service proposals, which requires "specific facts or comments along with supporting reasons that the person believes the Responsible Official should consider in reaching a decision," (36 CFR 215.6[b]). They were also advised that many of the concerns Mr. Juel raised in his January 25, 2000 letter are more appropriately addressed at the Forest Plan scale or at even a more broad scale. They have been asked to respond as specifically as possible to project level proposals. "Comments on an environmental impact statement or on a proposed action shall be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both," (40 CFR 1503.3[a]).

This position was supported by the Regional Forester's Appeal Reviewing Officer when these groups raised this issue in their appeal of the Coeur d'Alene River Ranger District's Small Sales Project Record of Decision (Appeal #01-01-00-0055): "Merely incorporating by reference previous letters or all of the plaintiff's briefs,



declarations and other supporting documentation...in lieu of specific comments...is not in keeping with the intent of 36 CFR 215, which allows the public the ability to make specific comments on a particular proposed action."

"

**B-2. The importance of heritage resources is known by the FS, that is why in Appendix FF of the Forest Plan " the requirement for a survey of such resources must be conducted prior to a project. Why is this survey " not performed during the EA process? "**

"

These areas have already been surveyed for heritage resources and specific heritage resource reports referenced (EA, page A-8). Any future discovery of cultural resource sites would be inventoried and protected if found to be of cultural significance. Decisions to avoid, protect, or mitigate impacts to these sites are in accordance with the National Historic Preservation Act of 1966 (EA, pages 2-23 and A-8).

"

**B-3. The project EA fails to address the impacts on soils in detail by discarding soils into Issues Not Discussed " in Detail, Appendix A. Even though this may be a small project, the direct, indirect, and cumulative " effects on soils is always significant. "**

"

The soils issue was considered and addressed, but based on the assessment of effects and public comment, we determined that this issue (and several others) could be adequately addressed through design features or other aspects of the proposed activities, and therefore it was not necessary to discuss the issue in detail in the Environmental Assessment (EA, page 2-27, A-7, A-8). Features designed to protect soil productivity are described in the Environmental Assessment (pages 2-21 and 2-22) and in this Decision Notice (Section 5.5).

Regardless of the size of the project, direct, indirect and cumulative effects on soils are not always significant. The significance of an action must be analyzed in several contexts, such as society as a whole, the affected region, the affected interests, and the locality (40 CFR 1508.27(a), Council on Environmental Quality, July 1, 1986, "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act"). This project has been analysis in these contexts, as disclosed in Section 7 of this Decision Notice (Finding of No Significant Impact).

"

**B-4. The project area has not been fully surveyed for all protected wildlife habitats. Where is the guarantee " that these areas will be protected or even surveyed after the project has started? "**

"

The methodology used to identify wildlife habitat is provided in the Environmental Assessment (pages 3-76 through 3-78) and Project Files (Wildlife). Features of the alternatives designed to protect wildlife habitat are also described in the Environmental Assessment (pages 2-22 and 2-23) and in this Decision Notice (pages 12-13). Conclusions are disclosed in this Decision Notice (Section 6.9 and in Attachment B).

The U.S. Fish and Wildlife Service has reviewed our analysis and concurred with our determination of effects (Project Files, BA/BE). Wildlife populations and habitats do not stay constant over time (EA, page 3-78). Habitat changes result in population increases or decreases, depending on the species. Human developments, habitat loss, fragmentation and disturbance have all affected wildlife species and habitat (EA, page 3-80). In addition, some populations are artificially controlled, such as the elk, woodland caribou and mountain goat transplants accomplished by Idaho Fish and Game to augment low populations and increase distribution.

"

**B-5. The IPNF has yet failed to establish management standards for northern goshawk in violation of FSM " 2670.32(5), therefore the project cannot legally proceed. "**

"

Forest Service Manual (FSM) 2670.32(5) states, "Establish management objectives in cooperation with the States when projects on National Forest System lands may have a significant effect on sensitive species population numbers or distributions. Establish objectives for Federal candidate species, in cooperation with the FWS or NMFS and the States." The Biological Evaluation for Sensitive Wildlife Species (Project Files, BA/BE's) documents the District Wildlife Biologist's finding that activities under the Selected Alternative may impact individual goshawks or habitat, but will not likely result in a trend toward federal listing or reduced viability for the population or species. Since this is not considered a trigger for significant action, establishment of management objectives is not required.

"

- B-6. The Forest Service has failed to complete an economic analysis of the Hither and Yon EA that provides the public with a full and fair accounting of net economic benefits. The EA and project record fail to place any economic value on existing uses and functions of the sale area, including recreation, flood control, pest control, carbon sequestering, and many other “ecosystem services.”**

A financial analysis was conducted for the Hither and Yon proposal (EA, pages 3-35 through 3-40). Forest Service policy (Forest Service Handbook 2409.18, Section 32) sets a minimum level of financial analysis for timber sale planning (EA, page 3-35). The financial analysis is used to compare the alternatives and to show that the costs are reasonable to achieve the desired end results. Non-commodity values were not included in this analysis because these resources are evaluated under the specific resource section. For the purposes of complying with NEPA, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are qualitative considerations (40 CFR 1502.23).

- B-7. A non-commercial restoration alternative for the Hither and Yon EA should have been further analyzed. We request that such an alternative be developed and analyzed in the final EA and that all costs and benefits, both monetary and non-monetary, of such an alternative be disclosed.**

None of the groups represented by Mr. Attemann raised this issue during scoping. The Forest Conservation Council proposed a no-harvest vegetative-restoration only alternative (EA, pages A-14, A-22). This alternative was considered but eliminated from further study (EA, page A-14, A-23) because it would not be a reasonable or efficient means of achieving the vegetative restoration goals, given the diverse needs and desires of the public. Timber harvest allows us to reduce fuel loads, create conditions to allow for the maintenance and establishment of pines and larch, and helps finance the vegetative restoration process (EA, page A-23).

- B-8. For many sensitive and management indicator species the Forest Service has no up-to-date population data describing population numbers, locations, and trends, nor monitoring data on which the agency can rely to determine that the actions proposed in the context of Hither and Yon EA will maintain numbers and distribution of these species sufficient for insuring long-term viability.**

Estimating population numbers and trends can be extremely difficult. Most estimates involve cooperative surveys and information sharing with other agencies, such as the Idaho Department of Fish & Game, Washington Department of Fish & Wildlife, Forest Service and University researchers. Examples of population trend information sources include ground surveys, aerial surveys, radio-collared animals, mortality and harvest reports, transplant activities, incidental sightings and law enforcement activities. Habitat information may be used where population data is lacking. Since the completion of the Forest Plan in 1987, surveys have been conducted on the IPNF for woodland caribou, grizzly bears, peregrine falcons, gray wolves, bald eagles, Townsend’s big-eared bats, wolverines, lynx, northern bog lemmings, harlequin ducks, northern goshawks, flammulated and boreal owls, black-backed woodpeckers, and Coeur d’Alene salamanders (1998 Forest Plan Monitoring Report, page 23). Direct population surveys have been completed for some species by Idaho Department of Fish & Game and Washington Department of Fish & Wildlife. Funding from timber sales (KV funds) and partnerships were also used for wildlife monitoring (1998 Forest Plan Monitoring Report, pages 23, 24). Such surveys and Forest Plan monitoring ensures that we are meeting long-term viability needs for wildlife species. Additional discussion is provided in Attachment B.

- B-9. As of this writing, there have been no sensitive plant surveys specifically for the Hither and Yon project. Even though such surveys are planned to have begun in the spring of 2001 and completed prior to implementation of ground-disturbing activities, the results need to be incorporated into the EA now, not after the fact. If the results were concluding that sensitive species and/or their habitats are present in the project area, then a Biological Evaluation is required.**

The Biological Evaluation and Biological Assessment have been prepared for this project (Project Files, BE/BA’s). Based on the location and extent of the activities that will occur, the District botanist made a determination that there will be no effect to the Threatened plant species water howellia (*Howellia aquatilis*) or Ute ladies-tresses (*Spiranthes diluvialis*), because there is a lack of suitable habitat in the project areas for these species (EA, page B-6). There is potential habitat for Spalding’s catchfly (*Silene spaldingii*); individuals and habitat of this species may be impacted by ground-disturbing activities.

Plant surveys were completed in 2002; no rare plants were found. Alternative design features and mitigation measures for Threatened and Sensitive plants will protect populations and species viability, although there may be some minor effects to habitat and possibly isolated individuals (EA, page B-6; DN, Section 5.7). New information about species occurrence within the project area will be evaluated and necessary adjustments made to the project design and layout if sensitive plant species are found. Please refer also to Section 5.10, which identifies specific mitigation measures that are required in order to fulfill the determination of effects in the Biological Evaluation for sensitive plants.

"

- B-10. In Chapter three of the EA there are several paragraphs that lead to question the purpose and need as well as the breadth of alternatives presented in this EA. For example, it is stated that, "Mountain pine beetles played a major role in killing individual trees and groups of white pine (Geographic Assessment, p. 29). Holes created in the canopy by the death of these overstory trees would likely be filled by the shade tolerant understory species. In the absence of further disturbance, climax forests of shade tolerant overstory and understory trees might be attained..." Instead of removing "some of this beetle kill," why not allow nature to regenerate through natural succession as stated in this EA? "**

"

The statement quoted by Mr. Attemann is from the description of "Disturbance and Successional Patterns" (EA, pages 3-6 through 3-7), and describe white pine mortality caused by mountain pine beetles, not Douglas-fir bark beetles. The harvest activities in the Hither and Yon project area are designed to harvest dead and dying trees in areas attacked by bark beetles, damaged by snow or ice, or opened by losses to root disease using salvage and regeneration harvest methods; reduce the long-term fire hazard, enhance historical ecosystem, and restore long-lived seral tree species in areas where a substantial portion of the live basal area of the stand has been lost to bark beetle, now or ice damage, and root disease (EA, page 1-3). Presence and effects of Douglas-fir beetles are described on page 3-7 of the EA.

The proposal that nature be allowed to regenerate through natural succession was considered as represented by the No-Action Alternative (EA, pages 2-11, 2-26, 2-28, 3-15). "...even if no action is taken, many of the stands proposed for treatment (70 acres) are moving toward the seedling/sapling category (because of past losses to bark beetles, ice and snow damage, and continuing mortality to root disease), and would regenerate back to the same cover type of Douglas-fir and hemlock," (EA, p. 2-26). "There are expected to be shifts in stand species composition due to mortality caused by bark beetles, but these shifts are not expected to increase the early seral species component. In most stands where over 50 percent of the basal area is killed by Douglas-fir beetles, the dominant overstory species following the beetle infestations is likely to be grand fir. In the absence of further disturbance these stands are likely to regenerate to Douglas-fir and grand fir, so there would be no long-term shift in species composition," (EA, p. 3-15). The Geographic Assessment has determined that there are more climax, shade-tolerant species in the Forest than occurred historically. Project activities will introduce long-lived seral species in an effort to return to the more historically healthy ecosystem conditions.

"

- B-11. If the Douglas-fir beetle outbreak is a natural cycle, what is the purpose for harvesting infected timber if the infestation is on the decline? What is the dispersal rate of spreading the Douglas-fir beetle through logging? "**

"

The purpose of the harvest is not to alter the Douglas-fir beetle cycle, but to salvage some of the beetle-killed trees for timber products, initiating fuels reduction treatment and restoring ecosystems in areas of low residual stand stocking levels (EA, page 1-2). Beetle populations would not be reduced by activities proposed under any alternative (EA, page 3-14). There is some risk of increase in beetle populations as a result of the treatment activities (EA, page 3-14). Bark beetles could infest green cut trees if not removed in a timely manner; however, provisions can be designed into sale contracts to greatly reduce this concern. The risk of an increase in beetle populations due to the presence of new stumps is low (EA, page 3-14). Recovery of the economic value of dead and diseased timber is one of the two primary objectives of this project (DN, page 1).

"

- B-12. Why are green trees being logged? "**

"

The objective of the Selected Alternative is to harvest dead and dying trees in areas attacked by bark beetles (EA, pages 3-16 through 3-18). In addition, commercial thin and improvement harvests in 4 of the Dobson Pass units (a total of 50 acres) will thin out or "daylight" around healthy ponderosa pine and larch (DN,

Section 5.1.4; and EA, page 3-23). Live or “green” trees will be removed during thinning and improvement harvests, but this will not create changes to the structural stage category beyond that already caused by the bark beetles and root disease (EA, page 3-24). Green trees will also be harvested in areas where site preparation or ecoburning activities will likely kill the smaller merchantable tree component (DN, Section 3).

”  
”

- B-13. Numerous studies, including government documents, have proven that logging prescriptions are not effective mechanisms, in fact it increases the risk of wildland ignitions, spread, intensity and severity and will not allow firefighters to contain and control a small fire before it becomes a large one as claimed in the EA. ”**

”

Mr. Attemann has cited statements from five references, but did not include copies of any of them. Of the five, we were not able to obtain a copy of the Sierra Nevada Ecosystem Project Final Report to Congress (1996), therefore we were unable to evaluate in context or respond to his statements based on this reference. The following addresses his remaining four references:

“Historical and Current Forest Landscapes in Eastern Oregon and Washington.” (USDA Forest Service, Pacific Northwest Research Station General Technical Report PNW-GTR-355, October 1995): Mr. Attemann has cited statements from p. 22 of this report in support of his contention that logging increases the risk of wildland ignitions, spread, intensity and severity, etc. However, in their conclusions and recommendations, the authors state, “Prescribed fire, along with mechanical measures if hazardous burning conditions exist, can be used for restoration purposes to regulate stand composition, reduce plant competition, and modify fuels to achieve a desired structure. Over time prescribed fires, natural fires, selective tree harvesting, or combinations thereof can be used to maintain desired conditions and processes,” (p. 36).

“Fire hazard from precommercial thinning of ponderosa pine. (G.R. Fahnestock, 1968. USDA Forest Service Research Paper PNW-57): We agree that commercial thinning does indeed increase fire intensity for a few years (Fahnestock estimated 5 years). Commercial thinning treatments are not designed for fuels reduction, but are applied to give young trees the growing space they need for optimal individual tree growth. In two units (one 28 acres, one 5 acres; a total of 33 acres) in the Dobson Pass area, commercial thinning has been identified as the preferred treatment, with the objective of improving the health and vigor of western larch in the stands (EA, page 2-12). The timber will be skyline yarded from the unit, and slash will be treated using the “lop and scatter” method, which gets fuels on the ground so they will decompose more quickly. The short-term fire risks are justified by the long-term stand objectives.

”

“Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin.” (USDA Forest Service, Pacific Northwest Research Station General Technical Report PNW-GTR-382, September 1996): Mr. Attemann cited statements from page 61 of this document: “The primary causative factors behind fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants.” However, there are numerous statements throughout the document that support management treatment to reduce the risk of severe fire. For example, “It is not possible to “fireproof” ecosystems in the Basin, but the potential of severe fire can be reduced by proactive land management,” (pp. 15, 184). The Hither and Yon project area is located within an area of the Interior Columbia Basin identified as Forest Cluster 4. Primary risks to ecologic integrity in these subbasins include risks to 1) hydrologic and aquatic systems from fire potentials; 2) late and old forest structures in managed areas; and 3) forest compositions – susceptibility to insect, disease, and fire (p. 113). Opportunities to address these risks include 1) restoration of late and old forest structure in managed areas; 2) connection of aquatic strongholds through restoration; and 3) treatment of forested areas to reduce fire, insect and disease susceptibility (p. 113). Also, “Fuel management is a priority for maintenance of hydrologic function in these subbasins,” (p. 116). Copies of the pages cited here are provided in the Project Files (Fire/Fuels).

“An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins.” (USDA Forest Service, Pacific Northwest Research Station General Technical Report PNW-GTR-405, June 1997): Mr. Attemann cites one sentence from the 700-page document. Since he did not identify the page number of the citation, we are unable to evaluate it in context. However, the assessment predicted trends and ecology of wildland fire (pp. 855-873), including the following statements: “Future predictions suggest a steady increase in fuel loads, fire susceptibility in forest structures and patterns, human-

caused ignitions, and development within the rural/wildland interface,” (p. 855). “The amount of crown fire resulting from wildfires in forest settings is of concern in terms of severe fire behavior and the accompanying danger to lives and property, as well as the effects on soil and watershed values,” (p. 866).

The assessment modeled disturbances using probabilities given a certain scenario and management class (p. 441). The “passive” scenario reflected minimal commodity production, where lands were predominantly used for recreation, education, and research. In the “consumptive demand” scenario, the goal was to maximize commodity production through grazing, timber harvest, and other management practices. The “active management” scenario focused on the maintenance and restoration of native ecosystem functions and processes based on the landscape ecology model of contextual opportunity and risk for proper functioning landscape systems. The study found that the amount of area disturbed by crown fire increased under consumptive demand and passive management scenarios, but decreased under an active management scenario, “largely because the level of wildfire disturbances was reduced due to vegetation treatment activities (for example, tree thinning and fuel reductions resulting from harvest and prescribed fire treatments),” (p. 866-867). “Our future projections indicated that the area burned by wildfire would be greatest under a passive management scenario, and least under an active management scenario,” (p. 868). “Results from modeling of rangeland wildfire scenarios indicated that active management on BLM/FS lands would cut the amount of wildfire in half, compared to the consumptive demand and passive scenarios,” (p. 869). Copies of the pages cited here are provided in the Project Files (Fire/Fuels).

- ”
- B-14. Hither and Yon EA avoids the required analysis and ignores important contributors to cumulative effects. Cumulative impacts are analyzed in context only of timber harvest, no attention is provided to other factors such as increased OHV use, increased risk of fire, grazing, noxious weeds, water quality. Even though there are no other future timber sales currently planned for the project area, there is private ownership and other agency lands (BLM) adjacent to the project area to the north, east, and south. Private ownership and other agency activities is moving toward smaller size classes and climax species types with multiple harvest entries occurring over time, making the forest more susceptible to wildfire. The Hither and Yon project fails to adequately disclose and consider the cumulative impacts on soils, potassium levels and fire risk.** ”
- ”

A cumulative effects analysis was conducted for resources in the Hither and Yon project areas, and findings are disclosed in the EA (Chapter 3 – Forest Vegetation, Fire/Fuels, Finances, Water Resources, Soils, Fisheries and Wildlife; and Appendix A - Recreation). Although not addressed specifically in Chapter 3 of the EA, effects to and of grazing and noxious weeds were considered in the analysis. Grazing allotments are discussed in Chapter 2 (page 2-9) and Appendix A (page A-8): “The proposed activities would have very little effect, if any, on the movement or management of cows, based on the location of and use within this allotment. An environmental assessment concerning management of allotments has been initiated and is expected to be completed in mid-2002.” The Grazing EA is in progress and is expected to be released in the spring of 2003.

Noxious weeds are discussed in Chapter 2 (pages 2-8, 2-10) and Appendix A (page A-7): “While existing infestations of certain weed species may continue to increase on Federal lands and adjacent private lands, features of the action alternatives would serve to minimize (but not eliminate) the risk of weed spread...Weed treatment will occur in compliance with the Coeur d’Alene River Ranger District Noxious Weed Environmental Impact Statement and Record of Decision (USDA Forest Service, 2000).”

- ”
- B-15. When will the counties decide upon the timber sale receipt payments? And when will it be determined if timber sale receipts will continue to be used to satisfy payments to the counties?** ”
- ”

Funds to the counties are discussed in the EA (page 3-37). The counties of Idaho have elected to take the average of the high three 25 percent payments. It is unclear whether timber sale receipts will still be used by the Treasury to help finance these payments to the counties. Whether timber sale receipts are used to satisfy payments to the counties would not influence the decision for this project.



## *Kootenai Environmental Alliance*

P.O. Box 1598 Coeur d'Alene, ID 83816-1598

Joseph P. Stringer, District Ranger  
Coeur d'Alene River Ranger District  
Fernan Office  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

July 5, 2002

Dear Mr. Stringer:

The following comments concern the Hither and Yon Beetle EA.

### A. Roadless areas:

On page 2-3 of the EA the following statement is made concerning roadless areas. "There are no lands in or adjacent to the Hither and Yon Project Areas identified as inventoried roadless."

On page 3-43 of the EA the Overview discussion of the Tepee Creek watershed above Trail creek indicated the upper portion of Tepee Creek is a 34.7 square mile, (22,208 acres), fifth-order watershed. It was also indicated in the discussion "Much of the lower (northern half) is unroaded." The discussion on page 3-43 did not indicate whether the unroaded area is a portion of the 5,100-acre Tepee Creek Roadless Area (01133), as identified in the IPNF Forest Plan.

The DN needs to indicate whether the unroaded area mentioned on page 3-43 is in fact the Roadless Area 01133. If the unroaded area is Roadless Area 01133, the DN should describe the distance in miles the nearest proposed logging unit is from the Roadless Area.

If the unroaded area is not Roadless Area 01133, the DN needs to indicate the size in acres of the unroaded area described on page 3-43.

The DN should also supply information that will indicate whether any portion of Roadless Area 01133, or the 34,700-acre Magee Roadless Area (01132) is within the Grassy Mountain cumulative effects analysis area.

### B. Foreseeable actions:

On page 3-43 the Teratoid Tepee EIS project is described as a large landscape level assessment. On page 2-9 the EIS project is listed as beginning in the year 2004. The preparation of an EIS for the Tepee Creek area indicates that significant environmental impacts may result as a result of proposed logging. The DN should describe the size in acres of the Teratoid Tepee analysis area and the potential amount of acres that would be proposed for logging as a result of the EIS.

#### C. Root Diseases:

Pages 3-6 and 3-7 include a discussion of logging and the planting of Douglas-fir species. The following sentences were included in the discussion. "The problems associated with root disease that develop in these stands as they mature were not recognized at the time". "Most areas regenerated since the late 1970's have been planted with white pine, western larch and/or ponderosa pine."

Information obtained by KEA in July of 1999 from the Forest Service indicated that between the years 1980 and 1998 approximately 14,015 acres of contracted DF were planted on the Coeur d'Alene River Ranger District.

During the same time period, approximately 10,773 acres of contracted WP/DF were planted on the District. Approximately 33,452 acres of contracted WP were planted on the District during the 1980-1998-time period.

Information presented in the USDA Forest Service document "Western Forest Insects" on pages 16 and 17 concerned tree diseases. The discussion on page 16 began with the following sentences. "Close relationships exist between insects and the organisms that cause tree diseases. Trees weakened or killed by root-rotting fungi, such as **Poria root rot**, **Phellinus [Poria] weirii** (Murr.) Gilbert-son, **annosus root rot**, **Fomes annosus** (Fr.) Cke., **shoestring root rot**, **Armillaria mellea** (Vahl. Ex Fr.) Kummer, and **Phytophthora lateralis** Tucker and J. Milb., often are attacked by bark beetles (Cobb et al. 1974)." Concerning insect damage in forests, on page 4 of the document it is stated, "The most ambitious effort to identify and estimate insect-caused losses in the Western United States was in 1952 (USDA Forest Service 1958)."

[Western Forest Insects, R.L. Furniss and V.M. Carolin, entomologists, retired, Pacific Northwest Forest and Range Experiment Station, Forest Service, Miscellaneous Publication No. 1339, November 1977, reprinted with corrections February 1980]

The DN needs to supply expert agency comments that confirm the Forest Service prior to the late 1970's did not recognize root disease problems that are associated with Douglas-fir trees. The DN also needs to supply high quality information that would confirm "most areas" on the District have been planted with WP, WL, and/or PP since the late 1970's.

#### D. WATSED model:

On page 3-50 the sediment yield section includes a discussion of the model and in-channel and streambank erosion. The discussion stated personal communication from the Forest Hydrologist indicates that sediment levels that are baseline for the model comes from natural in-channel and stream-bank erosion that was a measured parameter used in preparation of the model.

On page 3-50 there was also a section concerning rain-on-snow analysis and WATSED. The following sentence was included in the r-o-s analysis section. "However, rain-on-snow events are part of the precipitation patterns used in the base calculations for peak flows in WATSED (personal communication with Rick Patten, 2002)."

In The Lands Council v. Vaught, page 46, under c. lines 18 and 19 indicated the Court found that a description of the model's shortcoming is a description of a methodology concerning evaluation of in-channel and stream-bank erosion, and effects of r-o-s events.



The Court found, on page 48, "To be both high quality and significant, the description should specifically state that WATSED does not incorporate the effects of rain-on snow events in its peak flow analysis and that WATSED does not evaluate in-channel and stream-bank erosion. Because it does not, the Federal Defendants' decision violates NEPA."

The DN needs to supply high quality information that will indicate whether there exists a written description of the methodology and equipment that are used to gather data regarding natural in-channel and stream-bank erosion as they concern WATSED. The DN also needs to supply high quality information that will indicate whether there are a minimum number of r-o-s events that are needed to occur over a 20-year period in order to accurately build base information in the model for r-o-s events.

#### E. Old Growth:

On page 3-8 the following sentence is included in the discussion regarding current situation in the analysis areas. "Although the current stands may contain large old trees and provide some old growth characteristics, openings caused by root disease may be common, and a key component of the remnant white pine and larch will be missing." On page 3-78 it was indicated that the proposed logging activities could potentially affect 127 acres of mature forest, and ecoburning could affect another 72 acres of mature forest structure.

The DN should indicate whether field surveys in each analysis area indicated that openings caused by root disease are in fact "common" in each analysis area. The DN or the project files should supply high quality information contained in the Forest Plan and previous memos from the IPNF Forest Supervisor's that indicate allocated old growth stands must contain significant components of white pine and larch.

#### F. Fisheries/watershed:

On page 2-29 the last paragraph includes the following statements. "Although there would be no additive cumulative effects from this project at the watershed scale, the overall effects of this project in combination with the recent past and present actions would be to maintain the rate at which the Management Indicator Species recover with the analysis areas."

Idaho Fish and Game in their August 8, 1996 letter to District Ranger Matthews listed a number of concerns regarding the Big Elk Creek watershed. Page one of the Fish and Game letter included the following statements. "Big Elk Creek is a major watershed encompassed by the area boundaries. Fisheries resources and aquatic habitat in Big Elk Creek have been heavily impacted by past timber harvest and road construction in the drainage. Electrofishing surveys in Big Elk Creek the past two years show the cutthroat trout population to be at low densities, and monitoring by the IPNF clearly shows that past management in the Big Elk watershed has resulted in increased peak flow events, particularly as a result of rain-on-snow events. The stream channel is highly unstable, with considerable shifting of bedload material during each high water event." The Big Short Salvage DN on page DN-3 indicated there would be 16 logging units and 128 acres would be clearcut with reserves. On page 3-43 of the Hither and Yon EA it is indicated

the headwaters of Tepee Creek, above and including Big Elk Creek, is listed as a 303(d) watershed by the EPA for sediment and habitat alteration.

The DN needs to supply high quality information and accurate scientific analysis, NEPA at 40 CFR 1500.1(b), that has been acquired after 1996 that show the functioning at risk (FAR) status for the upper Tepee Creek watershed continues to be an accurate description of the watershed.

The DN also needs to supply high quality information and accurate scientific analysis that confirms there would be "no additive cumulative effects", page 2-29 of EA, to fisheries and fisheries habitat in the Grassy Mountain analysis area from the proposed logging and the past logging activities, including the Big Short Salvage timber sale.

G. Monitoring:

The DN should indicate whether monitoring reports associated with the Big Short Salvage timber sale, including sale administrator reports and watershed/fisheries reports are included as part of the Hither and Yon project files. If these reports are not included in the project files, the DN should indicate whether the monitoring reports are located in the Big Short Salvage timber sale files. Page DN-7 of the 1996 Big Short Salvage DN under Monitoring included the following sentence. "Activities in the Big Short Salvage Area will comply with specific monitoring requirements identified by the Forest Plan (Forest Plan, Chapter IV)."

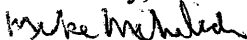
H. Dead wood:

Issue forty-two/March 2002 of the Pacific Northwest Research Station publication "Science Findings" on page one included the following statement. "Dead wood is a crucial component of healthy, biological diverse forests." On page 3-16 of the Hither and Yon EA the following statement is made. "The amount of stand dead and future down wood component would be reduced by the regeneration harvest treatments."

The DN should include information regarding the number of acres of standing dead wood and down dead wood that would be destroyed with the proposed logging in each analysis area.

We wish to receive a copy of the DN when it is released.

Sincerely,



Mike Mihelich

Forest Watch Coordinator



RECEIVED

JUL 10 2002

CD'A RIVER R.D.

Phone 509.838.4912 Fax 509.838.5155 Email [tlc@landscouncil.org](mailto:tlc@landscouncil.org) Website [www.landscouncil.org](http://www.landscouncil.org)

921 W. Sprague Ave. Suite 205

Spokane, WA 99201

Joe Stringer, District Ranger  
Coeur d'Alene Ranger District  
Idaho Panhandle National Forest  
2502 East Sherman Ave.  
Coeur d'Alene, Idaho 83814-5899

July 3, 2002

RE: Hither and Yon Environmental Assessment

Dear Mr. Stringer,

The following scoping comments on the Hither & Yon Environmental Assessment are submitted by The Lands Council on behalf of The Ecology Center Inc., Alliance for Wild Rockies, and Upper Columbia River of the Sierra Club.

We also incorporate the Ecology Center's January 25, 2000 letter to the Forest Supervisor, which the Coeur d'Alene River District Ranger received a copy, within these comments.

We incorporate all of Plaintiff's briefs, declarations, and other supporting documentation on the Douglas-Fir Beetle Project (Lands Council et al., v. Vaught) as comments on the Hither & Yon EA. The IPNF has a copy and knows the relevance of each of the issues, facts, and arguments contained therein to this proposed timber sale.

#### Features Designed to Protect Heritage Resources

The importance of Heritage Resources is known by the FS, that is why in Appendix FF of the Forest Plan the requirement for a survey of such resources must be conducted prior to a project. Why is this survey not preformed during the EA process? The knowledge of these resources could also sway the proposed alternative.

#### Soils

The health of the forest is dependent on the health of the area's soils. The project EA fails to address the impacts on soils in detail by discarding soils into Issues Not Discussed in Detail, Appendix A. Even though this may be a small project, the direct, indirect and cumulative effects on soils is always significant.

Application of Forest Plan Standards for soil protections requires direct, on-the-ground surveys in areas affected by previous management activities in order to provide numerical percentages of existing detrimentally disturbed Activity Areas. Without taking this step, decisions resulting in any soil impacts will be made lacking the cumulative effects analysis that NEPA requires. The Douglas Fir Beetle case is pertinent to this timber sale. The analysis of the Hither & Yon project not only fails to look comprehensively at the existing condition of the proposed units, but completely ignored potassium levels, despite their apparent role in root disease. The EA indicates that the project area has been logged before, presumably leaving detrimental soil conditions and possibly decreased soil productivity.

However, nowhere does the EA disclose the numerical percentage of existing detrimental soil conditions in those units, which is important as the above soil Standards indicate. In short, if those Standards are already exceeded in proposed units, the Forest Service must take steps to meet the detriment disturbance Standard before more activities are undertaken which would risk further soil disturbance in those units according to Forest Service Handbook at FSH 2509.18-94-1.

We also note that the roads, skid trails that lace the area appear not to be included in the analysis. The failure to disclose this information about the site-specific condition of the soils violates the Idaho Panhandle Forest Plan.

Thus the EA fails to provide an adequate analysis of cumulative effects, including both the impacts of past activities plus the impacts of the proposed activities. NEPA 40 C.F.R. § 1508.7 defines: "Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

The Hither & Yon Project has been previously logged, "many areas have had more than one harvest entry, particularly commercial thinning and sanitation/salvage harvests" (p. III-10). Along with the Beaver Creek project of the early 1990s, the cumulative effects of these past projects need to be analyzed more thoroughly.

The Regional Standards that specify how cumulative effects on soils are to be assessed are the same as Forest Plan Standards, they just apply to a broader area—the Northern Region—which includes the IPNF.

The discussion in the EA does not indicate if actual field monitoring of detrimental soil conditions has been completed in these units. Since the estimates used for project analysis do not appear to have been validated by evaluation of monitoring results. The National Forest Management Act at 16 U.S.C. 1600 (6)(g)(3)(E)(i) and (F)(v) requires that Forest Plans adopt measures to prevent permanent damage to the Soils. The Forest Plan has adopted the Forest Service Handbook at FSH 2509.18 as Standards to comply with NFMA. It is a violation of the Standards, the Forest Plan, and the NFMA for the Hither & Yon EA to be proposing to damage more soils before the Forest Service can demonstrate genuine reductions in detrimental soils conditions.

An adequate cumulative effects analysis must also consider the cumulative effects of cattle grazing. Cattle tend to graze in areas that have been disturbed by logging and road

building. Cattle grazing adds cumulative impacts to roadsides, cutting units, temporary roads and skid trails. New logging activities will change grazing patterns, which must be fully considered in cumulative effect analyses.

Activity Areas can also be impacted by motorized vehicle use, including 4-wheel drive vehicles, machines designed for off-road use (ORVs), and even snowmobiles, which have been shown to impact soils. NEPA analyses must evaluate cumulative detrimental soil disturbance from these causes.

NEPA documents should include maps which show cumulative proposed and past activities overlaid with land types so that risks to areas of unstable and highly erosive soils can be disclosed.

On page 2-21, under "Features Designed to Protect Soil Productivity," there are several questions that arise to soil productivity. The EA states that "Grappling areas would require that the piling equipment walk on slash as much as possible." What are the guidelines for "as much as possible." The EA states, "Minor soil disturbances would occur within skyline and cable units. Ground disturbance in helicopter units would be minimal," what is "minor" and "minimal" in terms of environmental impacts on soil productivity?

#### Features Designed to Protect Wildlife Habitat:

The project area has not been fully surveyed for all protected wildlife habitats. In the EA the Forest Service suggests proposed plans for the possible encounter of wildlife habitat in the project areas. We should know prior to the start of the project if there is sensitive wildlife habitat in the area. Where is the guarantee that these areas will be protected or even surveyed for after the project has started?

The preponderance of even-aged logging (shelterwood and group selection) that is proposed will increase the already high level of fragmentation within the wildlife analysis area. Habitat for non-game, interior-dependent species and plants will be greatly reduced which could result in a reduction of biodiversity.

#### Northern Goshawk

Since the northern goshawk is on the list of candidate species, which, in the opinion of the U.S. Fish & Wildlife Service may become threatened or endangered, the EA is in violation of FSM 2670.32(5). This provision requires that management standards be established for Federal candidate species when a project may have a significant effect on population numbers or distributions. The IPNF has as yet failed to establish these standards for the northern goshawk; therefore the project cannot legally proceed.

#### Socioeconomic Benefits and Value of Unlogged Forest

USFS timber sales are the end result of inter-related planning decisions and analysis made at the national, forest, and project level. 36 C.F.R. § 219.4. At the national level, the Forest Service prepares the Renewable

Resources Program (RPA), which determines output levels for all national forest resources based upon a comprehensive environmental and economic assessment of present and anticipated demands for and supply of renewable resources from forests in all ownership. At the forest level, the Forest Service has prepared the National Forest Land and Resource Management Plan ("LRMP"), which is an "extension" of the RPA Program and which identifies lands that are suitable for timber sales, the amount of timber to be offered each year, and under what conditions timber sales will be offered. At the project level, the Forest Service makes decisions about the specific configuration of individual timber sales, including Hither & Yon EA. At each level, the Forest Service must engage in environmental and economic analyses of its decisions as required by the National Environmental Policy Act.

The Forest Service is required by law to manage national forest system lands and programs to maximize social and economic benefits for the American people. As with other projects planned on the National Forests of Idaho and throughout Region 1, the Forest Service has failed to complete an economic analysis of the Hither & Yon EA that provides the public with a full and fair accounting of net economic benefits. Instead, the economic analysis is limited to net costs incurred by the Forest Service and project administrators for county receipts as well as sale preparation and administration costs.

The EA and project record fail to place any economic value on existing uses and functions of the sale area, including recreation, flood control, pest control, carbon sequestering, and many other "ecosystem services." In addition, the economic analysis fails to consider a wide range of costs that will be incurred by the public through loss of these "ecosystem services" and other externalized costs such as increased flooding, increased risk of death, injury, and property damage from logging operations, and increased fire risk.

The dollar value of undisturbed forest or standing timber should have been calculated and used in the analysis of economic costs associated with the Hither & Yon EA. The value of "ecosystem services" provided by standing forests has never been evaluated and compared with their value as lumber. Economic benefits of standing forests include but are not limited to clean air and water, balance of global geo-chemical cycles, and buffering of carbon emissions result from the burning of fossil fuels. It has been shown that the rate of carbon lost to that of accumulation is much greater during harvest, and there is a net transfer of carbon from biomass to atmospheric CO<sub>2</sub>. Further, the carbon stored in forest regrowth is less than that in the original forest biomass.

On page 3-38 with Table 3-9 on Cost/revenue, the proposed alternative is minus \$9,623. Are the cost of this project really that beneficial that the Forest Service has to foot the extra amount? Under the no action alternative, it is projected to cost an estimated \$20,000 for planning. What kind of issues are there for planning under a no action alternative? Please be more specific and direct.

Under the "Consistency With the Forest Plan and Applicable Regulatory Direction" on page 3-40 the EA describes the Forest Plan, "Management activities will continue to contribute to local employment, income, and lifestyles. The Forest will be managed to contribute to the increasing demand for recreation and resource protection while at the same time continuing to provide traditional employment opportunities in the woods product industry," (Forest Plan, page II-11, Objectives). Then the next paragraph states, "The No-Action Alternative would not meet this objective, since it does not propose any commercial timber harvest, and would not contribute to local employment or income. All action alternatives would meet this Forest Plan direction." If all the proposed alternatives are going to require the Forest Service to pick up the added costs to the proposed alternative, is that really a profitable timber sale?

### Range of Alternatives

A non-commercial restoration alternative for the Hither & Yon EA should have been further analyzed. We contend that:

- (1) all restoration objectives can be met without conducting a commercial timber sale, and in fact the EA acknowledges this in the response to public comments by Forest Conservation Council (EA p. A-23).
- (2) a commercial timber sale can only exacerbate current problems, no commercial timber sale will eliminate these problems, and;
- (3) the Forest Service cannot exclude a non-commercial alternative merely because existing funding structure would make it difficult.

Given the insignificant contribution of wood fiber to America's consumption requirements from national forest lands, the vast economic contribution of non-timber related jobs and income, and the growing body of scientific knowledge recognizing the ecological and economic advantages of non-commercial restoration, the agency has no excuse for not analyzing a non-commercial, restoration only alternative in more detail. We request that such an alternative be developed and analyzed in the final EA and that all costs and benefits, both monetary and non-monetary, of such an alternative be disclosed. Until, such action is taken, this NEPA analysis is considered incomplete.

### Species Viability

The Hither & Yon EA includes commercial harvest, ground-disturbing activities associated with timber harvest and other vegetative manipulation. These activities are likely to jeopardize the viability of species that find optimal habitat in forests with well-developed structures, and forests naturally disturbed by fire, disease and insect pathogens. These include sensitive species and management indicator species.

For many of these species the Forest Service has no up-to-date population data describing population numbers, locations, and trends, nor monitoring data on which the agency can rely to determine that the actions proposed in the context of Hither & Yon EA will maintain numbers and distribution of these species sufficient for insuring long term viability.



Because the Forest Service has no such data for most species adversely affected by the proposed management activities, and because what data there is suggests that such species are declining and otherwise at risk, the Forest Service runs afoul of viability and diversity requirements set forth in forest planning regulations 36 C.F.R. § 219.19 and § 219.26. "While precise data is not available on the amount of sensitive plant habitat and populations that have been impacted or lost due to past disturbances, it can be surmised that changes have occurred".

As of this writing, there have been no sensitive plant surveys specifically for the Hither & Yon project. Even though such surveys are planned to have begun in the spring of 2001 and completed prior to implementation of ground-disturbing activities, the results need to be incorporated into the EA now, not after the fact. If the results were concluding that sensitive species and/or their habitats are present in the project area, then a Biological Evaluation is required. A "Biological Evaluation" (BE) is defined at 2670.5(3) as "A documented Forest Service review of Forest Service programs or activities in sufficient detail to determine how an action or proposed action may affect any threatened, endangered, proposed, or sensitive species." FSM 2672.4 requires the Forest Service to "Review all Forest Service planned . . . activities for possible effects on . . . sensitive species". The biological evaluation is the means of conducting the review and of documenting the findings.

#### Insects and Disease and Purpose and Need

Described in the EA on page 1-2 under the "purpose and need", it states "This assessment documents the effects of salvaging some of this beetle-kill for timber products, initiating fuels reduction treatment, and restoring ecosystems in areas of low residual stand stocking levels. Some salvage of ice-damage, understory trees, and thinning around larch and ponderosa pine trees would also occur in areas associated with beetle mortality." In Chapter three of the EA on page 3-6 and 7 under the "Disturbance and Successional Patterns," there are several paragraphs, which lead to question the purpose and need as well as the breadth of alternatives presented in this EA. For example, under the paragraph "Fire" on page 3-6 it is stated that, "Mountain pine beetles played a major role in killing individual trees and groups of white pine (Geographic Assessment, p. 29). Holes created in the canopy by the death of these overstory trees would likely be filled by the shade tolerant understory species. In the absence of further disturbance, climax forests of shade tolerant overstory and understory trees might be attained...." Instead of removing "some of this beetle-kill", why not allow nature to regenerate through natural succession as stated in this EA?

Under the paragraph on the Douglas-fir Beetle on page 3-7, the EA states, "Douglas-fir beetles have likely always been present throughout the Coeur d'Alene sub basin. The presence of root disease in many of the Douglas-fir forest types has resulted in high endemic levels of the Douglas-fir beetle and the propensity for rapid beetle population build ups during favorable conditions (Lockman and Gibson 1998). Douglas-fir beetle outbreaks occur following disturbances such as windfall, snow breakage or fire. In particularly dry years, insect infestations and mortality could increase dramatically. In some cases, these insect infestations may have contributed to large stand replacing fires (Geographic Assessment, p. 30)." It is apparent that the Douglas-fir beetle has always

existed and is a natural phenomenon that occurs in cycles. The EA even states on page 1-1, "The Douglas-fir beetle outbreak that began on the district in 1998 is on the decline." If this is indeed a natural cycle, what is the purpose for harvesting infected timber if infestation is on the decline?

What is the dispersal rate of spreading the Douglas-fir beetle through logging?

Why are green trees being logged (p. III-14)?

With answers to these questions, a more educated decision could be made.

The EA has portrays conflicting information about the risk of increase in beetle populations as a result of the proposed treatments saying that the risk of an increase in beetle populations due to the "presence of new stumps is low" according to a personal conversation with Sandy Kegley, Forest Entomologist in British Columbia. However, Dr. Joseph W. Fox, a resident of McCall (Valley County) Idaho, submit the following on the Idaho Panhandle National Forests Douglas-fir Beetle Project Draft Environmental Impact Statement proposed actions regarding the insect outbreak risks, fire risks, and fuel hazards which is applicable to the Hither & Yon Project:

First, the Forest Service failed to adequately disclose that timber harvest methods could prolong Douglas-fir beetle outbreaks when stumps remain or when slash greater than 8 inch diameter remains. In their exalted book, *Western Forest Insects*, R.L. Furniss and V.M. Carolin (1980) note that in British Columbia stumps are a significant source of Douglas-fir beetles. The DFB DEIS proposes no action to remove or treat stumps. Furniss and Carolin also note that while logging slash rarely poses a problem in prolonging Douglas-fir beetle outbreaks, logging cull stems can be a serious concern (page 359). Many researchers have reported significant beetle emergence from large diameter slash or cull, especially if shaded.<sup>1</sup> Distinguishing between "cull" and "slash" may be a matter of opinion about diameter size classification of the logging residue. Slash or cull greater than 8 inch diameter could remain by prescription design, the Forest Service's failure to adequately supervise the harvest operation, negligence by the private contractor, or contractor default and abandonment during harvest. The DFB DEIS fails to disclose errors by the Forest Service and private contractors during past harvest operations. Also, the DFB DEIS fails to disclose the high probability of Forest Service and private contractor error and negligence during the proposed actions.

Second, the Forest Service failed to adequately disclose that timber harvest methods could increase the incidence of root disease. Douglas-fir beetles are known vectors of fungi<sup>2</sup> known to be pathogenic to Douglas-fir.<sup>3</sup> Certain fungi

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<sup>1</sup> "Atkins, M.D. and L. H. McMullen. 1958. Selection of host material by the Douglas-fir beetle. Can. Dep. Agric. For. Biol. Div. Sci. Serv. Bimon. Prog. Rep. 14(1): 3." "Dolph et al. 1975. Insects. In Forest residues management guidelines for the Pacific Northwest. USDA For. Serv. Gen. Tech. Rep. PNW-33, 273 p. pp. 151-152, 168-169, 198-200." "Johnson, N.E. 1960. Reduction of risk of losses by the Douglas-fir beetle and ambrosia beetles: An interim guide. Weyerhaeuser C., For. Res. Note 34, 8 p."

<sup>2</sup> Harrington, T.C., Furniss, M.M., Shaw, C.G. 1981. Dissemination of Hymenomycetes by *Dendroctonus pseudotsugae* Douglas-fir beetle (Coleoptera: Scolytidae). Sci. Monogr. Univ. Wyo. Agric. Exp. Stn. 71(5) 551-554.

may be associated with successful mass attack of Douglas-fir.<sup>4</sup> Also, Douglas-fir beetles and other insects may carry root disease pathogens that may be vectored to trees during maturation feeding or unsuccessful attack.<sup>5</sup> Douglas-fir beetles<sup>6</sup> and other insects<sup>7</sup> may vector a particularly virulent plant pathogen known as black-stain root disease.<sup>8</sup> Black-stain root disease may not be host-specific and, once established in a stand, may increase as a problem over the years.<sup>9</sup> Trees declining from black-stain root disease may harbor a succession of insect vectors.<sup>10</sup> Certain logging practices<sup>11</sup> and road construction<sup>12</sup> are known to exacerbate conditions that favor black-stain root disease spread. Harvest and mechanical thinning produce abundant food and breeding sites for several black-stain root disease insect vectors and possibly infection courts for plant pathogens.<sup>13</sup> Also, logging stumps and tree wounds caused by logging operations may produce volatiles that are attractive to bark beetles and other potential plant disease vectors.<sup>14</sup>

## Fire

One of the objectives in the Hither & Yon Project is the hope to reduce the spread, fire intensity, and fire severity of wildland fire by a combination of salvage and regeneration treatments. However, numerous studies, including government documents, have proven that logging prescriptions are not effective mechanisms, in fact it increases the risk of

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<sup>3</sup> Ross, DW, and Solheim, H. 1997. Pathogenicity to Douglas-fir of *Ophiostoma pseudotsugae* and *Leptographium abietinum*, fungi associated with the Douglas-fir beetle. *Can. J. For. Res.-Rev. Can. Rech. For.* 27(1): 39-43.

<sup>4</sup> Lewinsohn, D. Lewinsohn, E. Bertagnolli, C.L., and Partridge, A.D. 1994. Blue-stain fungi and their transport structures on the Douglas-fir beetle. *Can. J. For. Res.* 24(11): 2275-2283.

<sup>5</sup> James, R.L. and Goheen, D.J. 1981. Conifer mortality associated with root disease *Fomes annosus*, *Armillaria mellea* and insects *Scolytus ventralis*, *Dryocoetes confusus*, *Dendroctonus pseudotsugae*, *Dendroctonus pseudotsugae rufipennis*, *Buprestidae*, *Cerambycidae* in Colorado. *Plant Dis.* 65(6) 506-507.

<sup>6</sup> Goheen, D.J. and F.W. Cobb, Jr. 1978. Occurrence of *Verticicladiella wagnerii* and its perfect state, *Ceratocystis wagnerii* sp. nov., in insect galleries. *Phytopathology* 68: 1192-1195.

<sup>7</sup> Witcosky, J.J., T.D. Schowalter and E.M. Hansen. 1986. *Hylastes nigrinus* (Coleoptera: Scolytidae), *Pissodes fasciatus* and *Serminius carinatus* (Coleoptera: Curculionidae) as vectors of Black-stain root disease of Douglas-fir. *Environ. Entomol.* 15: 1090-1095.

<sup>8</sup> Landis, T.O. and L.B. Helburg. 1976. Black stain root disease of pinyon pine in Colorado. *Plant Dis. Rep.* 60: 713-717.

<sup>9</sup> Smith, R.S., Jr. and D. Graham. 1975. Black stain root disease of conifers. *US For. Pest Leaflet* 145.

<sup>10</sup> Witcosky, J.J., and E.M. Hansen. 1985. Root colonizing insects associated with Douglas-fir in various stages of decline due to black-stain root disease. *Phytopathology* 75: 399-402.

<sup>11</sup> Harrington, T.C., C. Reinhart, D.A. Thornburg and F.W. Cobb, Jr. 1983. Association of black-stain root disease with precommercial thinning of Douglas-fir. *For. Sci.* 29: 12-14.

<sup>12</sup> Hansen, E.M. 1978. Incidence of *Verticicladiella wagnerii* and *Phellinus weirii* in Douglas-fir adjacent to and away from roads in western Oregon. *Plant Dis. Rep.* 62: 179-181.

<sup>13</sup> Harrington, T.C., F.W. Cobb, Jr. and J.W. Lownsbury. 1985. Activity of *Hylastes nigrinus*, a vector of *Verticicladiella wagnerii*, in thinned stands of Douglas-fir. *Can. J. For. Res.* 15: 519-523."

<sup>14</sup> Rudinsky, J.A. 1966. Scolytid beetles associated with Douglas-fir: response to terpenes. *Science* 152: 218-219.

wildland ignitions, spread, intensity and severity and will not allow firefighters to contain and control a small fire before it becomes a large one-as claimed in the EA.

\*"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity."

-Sierra Nevada Ecosystem Project, 1996. Final Report to Congress

\*"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."

-Historical and Current Forest Landscapes in Eastern Oregon and Washington. Part II: Linking Vegetation Characteristics to Potential Fire Behavior and Related Smoke Production (PNW-GTR-355)

"As a by-product of clear-cutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high, especially the first year or two as the material decays. High fire-behavior hazards associated with the residues can extend, however, for many years depending on the tree. Even though these hazards diminish, their influence on fire behavior can linger for up to 30 years in the dry forest ecosystems of eastern Washington and Oregon."

-Historical and Current Forest Landscapes in Eastern Oregon and Washington. Part II: Linking Vegetation Characteristics to Potential Fire Behavior and Related Smoke Production (PNW-GTR-355)

"It appears significant that many large fires in the western United States have burned almost exclusively in slash. Some of these fires have stopped when they reached uncut timber; none has come to attention that started in green timber and stopped when it reached a slash area."

-G.R. Fahnestock, 1968. "Fire hazard from pre- commercially thinning ponderosa pine." U.S. Forest Service

"Fire severity has generally increased and fire frequency has generally decreased over the last 200 years. The primary causative factors behind fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants."

-Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin (PNW-GTR-382)

"The high rate of human-caused fires has generally been associated with high recreational use in areas of higher road densities."

-An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins-Volume II (PNW-GTR-405)

Timber harvest converts unavailable aerial fuels into available surface

fuels. Thus the risk of crown fire may be reduced while the risk of surface fire can be increased by adding fuel to the ground. In the short term there would be an increase in surface fuel loading in order to decrease long-term fuel loading. An increased fire hazard and risk of ignition from timber harvest may result. Treatment of created fuels can reduce these risks. The potential for a fire outside of proposed harvest areas, the overall fuel mosaic on the landscape, and future vegetation and fuel succession must be considered when planning fuels treatments.

The dry winter, spring and summer of 2001 in much of the inland northwest, has substantially increased the risk of wildfire.

What kind of treatments will be used to decrease fire risk on created fuel loading buildups?

The EA admits that the "commercial thinning treatments would increase the risk of stand replacing fire over the short term" (EA p. III-23). This is consistent with Judge Shea's recent findings on the Doug-fir Bark Beetle case that states that logging increases wildfire risk.

How will this fair with nearby and adjacent landowners? And will this meet the National Fire Plan objectives? At a time when communities and houses are at serious wildland fire risk, efforts in wildland urban-interface should be the priority-not these fuels reduction timber sales 4, 7, 9 miles from the nearest home. Increasing the risk of fire to human life and property violates IPNF Forest Plan management objectives on p. II-28 (USDA 1987).

Logging trees is focusing on the wrong forest fuel. Logging removes the least flammable of the forest fuels. Fuel treatment should be focusing on the most flammable of the forest fuels, such as brush, weeds, and the lower branches of the ladder fuel trees.

® "The majority of the material that we need to take out is not commercial timber. It is up to three and four inches in diameter. We can't sell it. Fire suppression and drought are to blame." - Denny Truesdale, USDA Forest Service Fire Specialist (C-SPAN 8-10-00)

® "Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes...In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds." (USFS)

® 62% of the fires in 2000 were in roaded areas on National Forests or outside the National Forests (as of 8/30/00).

® "Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity." -Sierra Nevada Ecosystem Project, 1996. Final Report to Congress.

Fire clears the forest floor and adds nutrients to the soil which is necessary for young, succulent foliage, rejuvenated huckleberry bushes, whitebark pine

tree seed, and much more. Burned forests create idea-growing conditions for morel mushrooms, and provide generous revenue to mushroom pickers the spring following a fire. This activity has not been mentioned in the EA. Why not?

### Cumulative Effects

The Forest Service Environmental Policy and Procedures Handbook sets the standard for analysis of cumulative effects:

"Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions, when added together, may have collective or cumulative impacts which are significant. Cumulative effects, which occur, must be considered and analyzed without regard to land ownership boundaries. Consideration must be given to the incremental effects of past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals."

Despite this clear direction, the Hither & Yon EA avoids the required analysis and ignores important contributors to cumulative effects. Cumulative impacts are analyzed in context only of timber harvest, no attention is provided to other factors such as increased OHV use, increased risk of fire, grazing, noxious weeds, water quality. Even though there are no other future timber sales currently planned for the project area, there is private ownership and other agency lands (BLM) adjacent to the project area to the north, east, and south. Private ownership and other agency activities is moving toward smaller size structure classes and climax species types with multiple partial harvest entries occurring over time, making the forest more susceptible to wildfire.

NEPA and the Forest Service Handbook work together to require that the Forest Service disclose and consider the cumulative impacts of past, present, and future actions in an EIS. NEPA at § 1508.25 makes this clear,

*agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts. They include:*

*(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.*

The Forest Service Handbook describes a cumulative impact as,

*Cumulative Impact.*

*...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR 1508.7)*

### **Non-Compliance**

The Hither & Yon Project fails to adequately disclose and consider the cumulative impacts on soils, potassium levels and fire risk. Rather than conduct an analysis as described above by the Forest Service Handbook (FSH), the EA uses the cumulative effects analysis to dismiss all negative impacts of the proposed alternative,

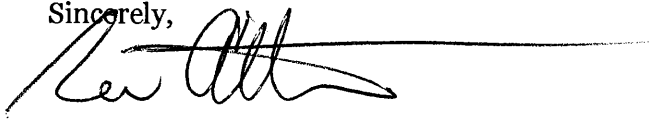
The FSH requires that the cumulative effect analysis describe the impact that the Hither & Yon Project will have on the environment when added to other past, present, and reasonably foreseeable actions.

Secure Rural Schools and Community Self-Determination Act of 2000

When will the counties decide upon the timber sale receipt payments? And when will it be determined if timber sale receipts will continue to be used to satisfy payments to the counties?

Please address these issues in your final environmental analysis. Thank you for your time and consideration. In closing, we ask that you send us all further information with the progression of this project.

Sincerely,



Rein Attemann  
The Lands Council

Sherman Banford  
The Ecology Center, Inc.  
801 Sherwood Suite B  
Missoula, MT 59802

Hal Rowe  
Upper Columbia River Group of the Sierra Club  
35 W. Main  
Spokane, WA 99201

Ryan Shaffer  
Alliance For Wild Rockies  
PO Box 8731  
Missoula, MT 59807

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